

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/7/98

TIMOTHY JOHN KEATING, white male, born [REDACTED], [REDACTED], Social Security Account Number [REDACTED], home address [REDACTED], telephone [REDACTED] was interviewed in the office of Attorney JAMES HAMILTON of the firm of Swindler & Berlin, 3000 K Street, N.W., Suite 300, telephone [REDACTED], who was present throughout the interview.

After being advised of the personal and official identities of the interviewers and the purpose of the interview, KEATING provided the following information:

KEATING is currently employed as Vice President and Partner, Timmons and Company, 1850 K Street, N.W., Washington, D.C., office telephone [REDACTED], cell phone [REDACTED].

From January of 1993 through March of 1996 and from November of 1996 through March of 1997, KEATING was employed as Special Assistant to the President and Staff Director of Legislative Affairs with an office in the West Wing of the White House, second floor, telephone [REDACTED]. From April of 1996 through October of 1996, KEATING was assigned to work on the Democratic National Convention.

KEATING first became aware of MONICA LEWINSKY in about early November of 1995. There was an opening in the Congressional Correspondence Section at Legislative Affairs. LEWINSKY was brought to KEATING's attention by ASHLEY RAINES, Special Liaison to Management and Administration, as a bright young intern working in the Chief of Staff's Office, who RAINES thought would do well in KEATING's office.

KEATING followed up on RAINES' suggestion and interviewed LEWINSKY. LEWINSKY was also recommended by JENNIFER PALMIERI and LEON PANETTA. KEATING hired LEWINSKY to work in the Congressional Correspondence Section of Legislative Affairs.

LEWINSKY initially performed well in the job but spent too much time out of the office and not enough time doing what she should have been doing. The Congressional Correspondence Section was only a two-person office supervised by JOCELYN JOLLEY. Since it was such a small office with a large volume of

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by [REDACTED] Date dictated 2/7/98

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work, everyone needed to work hard.

LEWINSKY was frequently away from her desk. When questioned about these absences, LEWINSKY would have a ready excuse, such as, delivering a letter to the Old Executive Office Building, the West Wing of the White House, or an unscheduled but necessary trip to "the Hill." KEATING described LEWINSKY's work habits as having "poor time management."

KEATING could not recall any specific disciplinary problems and LEWINSKY was never given a written reprimand; however, LEWINSKY was given a few verbal reprimands and counseled about her lack of proper time management.

KEATING gave an example of LEWINSKY's poor time management as when LEWINSKY would deliver a single piece of correspondence rather than waiting until several pieces of correspondence had accumulated for delivery to a distant location.

As mentioned above, JOLLEY and LEWINSKY were the only people working in the Congressional Correspondence Section of the Legislative Affairs Office. There were other Legislative Affairs employees working in the East Wing near the Congressional Correspondence Section. KEATING identified these employees as JANET MURGUIA, assigned as House Liaison; TRACY THORNTON, Senate Liaison; BARBARA CHOW, Senate Liaison; LUCIA WYMAN, House Liaison; ANN JOHNSON, Staff Assistant; ANN CATTALINI, Staff Assistant; and six to eight, short-term interns working in various locations throughout the Legislative Affairs Office.

KEATING was not aware of any of LEWINSKY's co-workers in Legislative Affairs who could be considered a close friend of LEWINSKY. KEATING was also not aware of any one in the White House who could be considered a close friend of LEWINSKY with the possible exception of ASHLEY RAINES.

KEATING did not have a personal relationship with LEWINSKY and LEWINSKY never told KEATING of having a sexual affair with anyone in the White House or anywhere else. KEATING has never heard rumors or gossip about LEWINSKY having a sexual affair with anyone in the White House.

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KEATING is aware of why LEWINSKY and JOLLEY were both moved out of the Congressional Correspondence Section. KEATING described the work in the Congressional Correspondence Section as being very demanding and stressful, with short "turn-around" times on responding to the many letters relating to Legislative Affairs. Both LEWINSKY and [REDACTED] were "in over their heads." LEWINSKY did not appear to be able to make the transition from an intern to a staff member, and handle the resulting work pressure.

The final incident which caused both JOLLEY and LEWINSKY to be moved from Congressional Correspondence was when they took a large "batch" of correspondence to the Office of Management and Budget, some of which were up to six months old, and demanded that the Office of Management and Budget prepare immediate responses.

The incident was reported to JODIE TORKELSON, Director of the Office of Administration, who took the matter to EVELYN LIBBERMAN, Deputy Chief of Staff, who brought the matter to KEATING's attention.

In addition, LIBBERMAN called to KEATING's attention that LIBBERMAN had observed LEWINSKY on several occasions walking around the West Wing, seemingly trying to observe the President or other high officials and get in a "photo-op."

The collective decision was made to move both JOLLEY and LEWINSKY from the Congressional Correspondence Section to a less demanding position elsewhere in the government.

KEATING contacted both BOB NASH, Director, and PATSY THOMASSON, Deputy Director, Presidential Personnel Office, and discussed with both of them the possibility of relocating both [REDACTED] and LEWINSKY.

[REDACTED] was found a position at General Services Administration and LEWINSKY was placed in the Department of Defense at the Pentagon by the Presidential Personnel Office.

After LEWINSKY's transfer to the Pentagon, KEATING did see LEWINSKY at the White House on a few occasions. KEATING recalled seeing LEWINSKY at a "Welcome Home" party at the White House just after the 1996 election. KEATING also recalled seeing

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LEWINSKY in the West Wing; near the Staff Mess; and on the driveway near the White House. KEATING has not seen LEWINSKY in the area of the Oval Office.

KEATING spoke to LEWINSKY on these occasions but never inquired as to LEWINSKY's reason for being at the White House.

KEATING has no knowledge of the President visiting the Congressional Correspondence Section while LEWINSKY worked there. KEATING explained the Oval Office is located in the West Wing while the Congressional Correspondence Section is located in the East Wing. The two offices are some distance apart. KEATING felt certain that staff members would have made him aware of any visits by the President.

KEATING has talked to no one other than family members and his attorney about today's interview. KEATING did meet last evening with HAROLD ICKES for drinks and mentioned to ICKES that he was being interviewed today. There was no discussion of what the interview was to be about; what KEATING was going to say; nor did ICKES indicate to KEATING what KEATING should say during the interview.

Timothy Keating, 2/25/98

Grand Jury

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CONDENSED TRANSCRIPT AND CONCORDANCE
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

In re:

GRAND JURY PROCEEDINGS

Grand Jury Room No. 4

United States District Court

for the District of Columbia

Third & Constitution, N.W.

Washington, D.C. 20001

Wednesday, February 25, 1998

The testimony of TIMOTHY JOHN KEATING was taken in
the presence of a full quorum of Grand Jury 97-2, impaneled

on September 19, 1997, commencing at 12:03 p.m., before:

SOLOMON WISENBERG

MARY ANNE WIRTH

DAVID BARGER

Associate Independent Counsel

Office of Independent Counsel

1001 Pennsylvania Avenue, Northwest

Suite 490 North

Washington, D.C. 20004

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understand that?

A Yes, sir.

Q If you have retained counsel, he or she can't

be in here with you, but the Grand Jury will permit you

a reasonable opportunity to step outside the Grand Jury

room to consult with counsel, if you desire. Do you

understand that?

A Yes, sir.

Q Your counsel is outside; is that correct?

A That is correct, sir.

Q What is your counsel's name?

A Jim Hamilton.

Q We're all bound by an oath of secrecy -- myself,

the grand jurors, Ms. Wirth, the Grand Jury court reporter

-- with certain exceptions that I'll get into. Do you

understand that?

A Yes, sir.

Q You are not bound by any oath of secrecy. Do you

understand that?

A Yes, sir.

Q You can talk to anybody you want to about your

appearance, or not talk to them at all. That's between you

and your attorney. Do you understand that?

A Yes, sir.

Q Now, I'll tell you about some of the exceptions to

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Whereupon,

TIMOTHY JOHN KEATING

was called as a witness and, after being first duly sworn by

the Deputy Foreperson of the Grand Jury, was examined and

testified as follows:

EXAMINATION

BY MR. WISENBERG:

Q Could you state your name for the grand jurors,

please.

A Timothy John Keating.

Q And could you spell your last name.

A Certainly. K-e-a-t-i-n-g.

Q Mr. Keating, my name is Sol Wisenberg. We met out

in the hallway yesterday; is that correct?

A That is correct, sir.

MR. WISENBERG: And I'm here with my colleague,

Mary Anne Wirth. We're both with the Office of Independent

Counsel.

And these are the grand jurors, and this is the

Grand Jury court reporter.

Let the record reflect that we have a quorum, and

there are no unauthorized persons in the Grand Jury room.

That's correct, is it not?

DEPUTY FOREPERSON: Yes, it is.

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our oath of secrecy.

As a example, if there was to ever be a trial

resulting from our investigation, and you got up at trial

and testified, and you said something different than what you

said here today, we could use your Grand Jury transcript --

anybody could -- to say, "Mr. Keating testified differently

in Grand Jury." Do you understand that?

A Yes, sir.

Q Another example would be we have FBI agents who

help us in our investigation. They get to know what goes on

inside the Grand Jury. Do you understand that?

A Yes, sir.

Q They are also bound by an oath of secrecy, but they

get to know what goes on. Do you understand that?

A Yes, sir, I do.

Q Independent counsel, under certain circumstances,

with a court order -- when and if the independent counsel

makes his or her report to the House of Representatives,

with the proper court order, independent counsels can reveal

certain things that happen in front of the Grand Jury. Do

you understand that?

A Yes, sir, I do.

Q All right. There are three kinds of witness who

come in front of the Grand Jury -- witnesses, subjects,

and targets.

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BY MR. WISENBERG:

Q Before we start, I'm going to briefly talk about

our authority and your rights and responsibilities as a

Grand Jury witness.

A Okay, sir.

Q I'll occasionally ask you if you understand

something I've read to you, and I'll need a audible

response --

A Okay.

Q -- a "Yes," a "No," a "Maybe," so that the

Grand Jury court reporter can pick it up. She can't pick up

"Un-un," "Uh-huh," or shakes of the head. Understand?

A Yes, sir.

Q Okay. This is a federal Grand Jury impaneled

by a United States District Court judge here conducting

an investigation of possible violations of federal criminal

laws involving possible perjury, obstruction of justice, and

subornation of perjury. Do you understand?

A Yes, sir.

Q You may refuse to answer any question, if a

truthful answer to that question would tend to incriminate

you. Do you understand that?

A Yes, sir.

Q Anything that you do say may be used against you by

the Grand Jury or in a later legal proceeding. Do you

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A target is somebody who the Grand Jury and the

prosecutor think it's more likely than not that they're going

to indict. Do you understand that definition?

A Yes, sir.

Q You are not a target. Do you understand that?

A Yes, sir.

Q A subject is somebody who's not at target status,

but the prosecutor and grand jurors have questions about

their behavior. Do you understand that definition?

A Yes, sir.

Q You are not a subject. Do you understand that?

A Yes, sir.

Q A witness is somebody who has information that is

within the Grand Jury's jurisdiction to inquire about. Do

you understand that definition?

A Yes, sir.

Q You are a witness. Do you understand that?

A Yes, sir.

Q Do you understand we can't guarantee you you'll

never be a subject or a target?

A Yes, sir.

Q All right. You're here pursuant to subpoena; is

that correct?

A That's correct, sir.

Q Did you bring any documents with you?

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[1] A No, sir.
 [2] Q Okay. Your attorney handed me a statement
 [3] yesterday.
 [4] A Yes, sir.
 [5] Q Do you have a copy of that statement with you?
 [6] A I do not. I --
 [7] Q It's basically a statement to the effect that at
 [8] one time after Monica Lewinsky got -- after you sent her
 [9] over, or helped send her over to the Pentagon, that she sent
 [10] you a letter complaining about it, is that correct?
 [11] A It was more than that. I mean, it was a letter,
 [12] you know, asking to come back.
 [13] Q Okay.
 [14] A It was -- you know, it was a plea come to back.
 [15] Q Okay. We'll get into that later.
 [16] A Yes, sir.
 [17] Q But the point is, as I understand it -- you correct
 [18] me if I'm wrong -- you got rid of that letter and, as far as
 [19] you know, it doesn't exist anymore.
 [20] A As far as I know, it does not exist anymore.
 [21] Q Was it a handwritten note?
 [22] A It was handwritten.
 [23] Q Okay. You know that you can't lie to us.
 [24] A Yes, sir.
 [25] Q All right. If you lie, that's perjury, and that's

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[1] A No, sir.
 [2] Q Okay. Before there -- before -- that's ACLI
 [3] it's called?
 [4] A Yes, sir, ACLI.
 [5] Q Before there?
 [6] A I was at the White House.
 [7] Q What was your job at the White House?
 [8] A Special assistant to the President and staff
 [9] director for legislative affairs.
 [10] Q All right. Within legislative affairs, what level
 [11] is staff director? I mean, number one person? Number two
 [12] person? Number three person?
 [13] A There's -- the White House is in tiers. Assistant
 [14] to the President is the top tier. Then there's a deputy
 [15] assistant to the President, and special assistant to the
 [16] President. I fell in between special and deputy.
 [17] Q Okay.
 [18] A It was a unique role.
 [19] Q But, I mean, within legislative affairs.
 [20] Where was I?
 [21] Q Yeah.
 [22] A Number three, in all likelihood.
 [23] Q All right. Who was number two?
 [24] A Susan Brophy.
 [25] Q Who was number one?

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[1] a federal crime.
 [2] A Yes, sir.
 [3] Q All right. If there's any question you don't
 [4] understand, please ask us to repeat it because, you know,
 [5] it's vague, we haven't quite asked it in the right way,
 [6] it's incoherent.
 [7] A Yes, sir.
 [8] Q Ask us to repeat it, and we'll try to make it more
 [9] clear, okay?
 [10] A Okay, sir.
 [11] Q All right. Before we go on, are there any questions
 [12] you have about your rights and responsibilities as a
 [13] Grand Jury witness or about our authority?
 [14] A No, sir.
 [15] Q Okay. How old are you?
 [16] A Thirty-six years old.
 [17] Q And where are you from originally?
 [18] A Originally, Scranton, Pennsylvania.
 [19] Q All right. Tell us about your education.
 [20] A College, you mean?
 [21] Q Right. Where did you graduate?
 [22] A Oh, I graduated from the University of Scranton
 [23] in 1985.
 [24] Q All right. And what is your current occupation?
 [25] A I'm a lobbyist.

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[1] Q And for what company?
 [2] A A partner at Timmons and Company. It's a
 [3] D.C.-based lobbying firm.
 [4] Q All right. And any particular area that you lobby
 [5] in, or just general lobbying?
 [6] A No, sir, general lobbying.
 [7] Q How did you get that job?
 [8] A I just -- I just got it just several months ago.
 [9] The board offered me a partnership, and I just accepted it.
 [10] Q How long have you been there? Is it a few months?
 [11] A It's weeks -- probably six weeks.
 [12] Q All right. Before you did that, what did you do?
 [13] A I was vice president for federal affairs for the
 [14] American Council of Life Insurance for 10 months. It's a
 [15] trade association here in Washington that represents 540
 [16] insurance companies.
 [17] Q 1001 Pennsylvania Avenue?
 [18] A Yes, sir.
 [19] Q Okay. And how long were you doing that?
 [20] A Ten months.
 [21] Q And what did you say -- vice president for what?
 [22] A Federal affairs. I was a lobbyist. I was the
 [23] chief Democratic lobbyist.
 [24] Q All right. You weren't in the communications
 [25] area there?

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[1] A There were several people -- during this
 [2] time period?
 [3] Q Well, when you left.
 [4] A When I left, it was John Hillely.
 [5] Q Okay. And what were the years that you worked as
 [6] staff director for?
 [7] A I was special assistant to the President when I
 [8] first went in in 1993. I moved up to staff director in 1994,
 [9] and was staff director in '94, '95, '96. And I left in April
 [10] of '97.
 [11] Q Okay. Plus, you were staff director when you left,
 [12] too, right?
 [13] A Yes, sir.
 [14] Q Okay. April '97. So you're there from '93 to
 [15] '97. When did you say in '93?
 [16] A The first day, January --
 [17] Q Is it January 20th?
 [18] A -- 20th.
 [19] Q Of 1993, until April of '97, correct?
 [20] A Yes, sir. It was April 15th.
 [21] Q Okay. And you became staff director in
 [22] '94, correct?
 [23] A I'm sorry, I said April. It's March. I'm trying
 [24] to figure out when Saint Patrick's Day was.
 [25] Q March.

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[1] A March.
 [2] Q March 15th.
 [3] A Yes, sir.
 [4] Q Okay. It's almost as famous as April 15th.
 [5] A That's it.
 [6] Q Well, how did you get your job in office of
 [7] legislative affairs?
 [8] A When I -- I was working on the Hill, and I was
 [9] contacted by Howard Paster. This was after the election in
 [10] November. Howard was doing the confirmation team for the
 [11] President's cabinet. He was getting them confirmed. And he
 [12] asked if I would come down and help him.
 [13] Q All right. And you just stayed on?
 [14] A Yeah, I did. And sometime -- you know, sometime
 [15] before January -- you know, probably sometime in December --
 [16] Howard had asked me to come on as special assistant to the
 [17] President and try and help him run -- manage things in
 [18] legislative affairs.
 [19] Q In September of when?
 [20] A No, no, I'm sorry -- December.
 [21] Q December.
 [22] A December of '92.
 [23] Q Of '92?
 [24] A Yes, sir.
 [25] Q Okay. He was the original head of legislative

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1: affairs -- Howard Paster?
 2: A Yes, sir.
 3: Q That's P-a-s-t-e-r?
 4: A P-a-s-t-e-r.
 5: Q All right. And he was replaced by who?
 6: A He was replaced by Pat Griffin.
 7: Q All right. And then Griffin was replaced by
 8: Hilley?
 9: A John Hilley.
 10: Q Okay. Well, we'll get into exactly the times that
 11: the number one people there were in a minute.
 12: A Yes, sir.
 13: Q Tell us what you did. What were your duties when
 14: you went to work there?
 15: A Various duties. I was -- even though I didn't have
 16: the title of staff director yet, I generally was. I -- you
 17: know, any personnel decisions, moving people around -- there
 18: was an administrative function to that office -- I handled
 19: that, as well as lobbied both House and Senate on any issue
 20: that came before the Congress.
 21: I didn't usually track it through committee. I
 22: just -- I did the floor piece of it because of personal
 23: relationships with members of the House and Senate.
 24: Q All right. Which leads into my next question
 25: of: What did the office do?

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1: A What's the function of office of legislative
 2: affairs?
 3: Q Right.
 4: A You're the liaison between the Hill and the
 5: President -- and vice versa, between the President and
 6: the Hill.
 7: You -- you know, if there's a problem that --
 8: you're trying to push the administration's priorities --
 9: legislative priorities -- forward.
 10: You're also -- you know, you also have to represent
 11: to Congress -- the members of the House and Senate -- to the
 12: President -- this is what they're saying.
 13: Q Okay.
 14: A So it's a -- it's a reverse role. It's both sides.
 15: Q You mentioned that you would be involved before a
 16: bill got to committee stage?
 17: A No, I'd usually -- I did it when it hit the floor.
 18: Q When it hit the floor?
 19: A Yes, sir.
 20: Q Okay. What does that mean, when it hits the floor?
 21: A When -- when it comes -- when it comes, actually,
 22: before the body.
 23: Q Out of committee?
 24: A Yes, sir. When it comes out of committee and goes
 25: to the floor of the House or to the floor of the Senate.

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1: Q Because that's where your contacts were -- more of
 2: your contacts?
 3: A It's members, yeah.
 4: Q Now, it's not only people who work in office of
 5: legislative affairs who are able to move things on the Hill;
 6: is that correct?
 7: A All items that are moved on the Hill should be
 8: moved through the office of legislative affairs.
 9: Q But as example, let's say you have a guy like a
 10: George Stephanopoulos -- really high up, who also came from
 11: the Hill. If you've got a particular piece of legislation
 12: that needs to get through, he's not in office of legislative
 13: affairs, but it was quite possible that he could have called
 14: some people, that kind of stuff?
 15: A That's true, yeah. But it's usually done in
 16: coordination with.
 17: Q Okay.
 18: A I mean, it's not a perfect system. People -- we
 19: always called them junior legislative affairs staff. Anybody
 20: that once worked on the Hill feels they have the right to
 21: call the Hill.
 22: Q Okay.
 23: A It's, you know -- yeah, that's always been a
 24: problem with every administration, not only this.
 25: Q What were the components of the office -- the

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1: official components, if there were any? Was it broken down
 2: into sections, divisions?
 3: A There was, yes. There was a West Wing office,
 4: where I was. There's where the director was, the deputy
 5: direct, myself, and two staff assistants.
 6: Then there was the East Wing, and that was broken
 7: into three pieces. There was a House liaison office; there
 8: was a Senate liaison office; and then there was an office
 9: of correspondence.
 10: So the office was really separated, you know. I
 11: was in the West Wing, everybody else was in the East Wing.
 12: And then, in the East Wing, the House was on one side of
 13: the aisle, the Senate was on the other side. And then
 14: down the hallway, in a separate corridor, was the office
 15: of correspondence.
 16: Q Would it be fair to say that the West Wing office
 17: was more prestigious?
 18: A Surely, Yes.
 19: Q And what did House and Senate liaison do?
 20: A It's the same. There are lobbyists for the House
 21: and lobbyists for the Senate. They track legislation to and
 22: -- you know, through the committee process.
 23: They're supposed to be on the Hill every day,
 24: moving around, trying to find out what's going on, trying to
 25: help members. They're the contacts. That's the President's

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1: face on the Hill.
 2: So one group does it for the House, one group does
 3: it for the Senate.
 4: Q All of these people, aside from the director and
 5: the deputy director, worked for you. They were under you in
 6: the chain of command.
 7: A Yeah. There were two deputies, though. There was
 8: a House deputy and there was a Senate deputy.
 9: Q Okay.
 10: Q And, you know, it -- you know, the lines there are
 11: more fuzzy. You know, if I called them up and asked them to
 12: do something, I would do it -- they would do it for me.
 13: You know, technically, on the chart in the
 14: White House they were above me but, you know, that never
 15: really mattered much.
 16: Q Okay. And is that based on some know-how
 17: that you had?
 18: A Yes, sir.
 19: Q You'd call them up, based on your knowledge, and
 20: say, "You need to do this. You need to do that." It's not
 21: like you're giving them orders. It's like, "This is what
 22: needs to be done to get the legislation passed."
 23: A We were colleagues. And, you know, when you work
 24: 18 hours a day, you generally become friends with people,
 25: and there's no -- there's no power trip, you know. You know,

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1: everybody works to -- for one -- for one goal, and whatever
 2: that goal is for that day, to try and get it done.
 3: Q Would it be fair to say that you usually had more
 4: hands-on experience with the Hill than the deputy directors?
 5: A No, they -- they were to be on the Hill every day.
 6: Not Brophy -- not Susan Brophy. She was the inside. But,
 7: yeah, there was -- there was a House liaison. And the way
 8: the office -- maybe I should explain the way the office is
 9: set up. It may be easier.
 10: Q In the House, there is a deputy director for the
 11: House liaison, and then there were several special assistants
 12: to the President.
 13: They're the -- that is the -- and the same on the
 14: Senate side -- a deputy assistant to the President and
 15: several special assistants to the President.
 16: They are the day-to-day lobbyists on the Hill.
 17: They're the ones that have line item responsibilities for
 18: this committee or this legislation. I wouldn't get to that
 19: point until it actually came to the floor.
 20: Q Okay. Got you. Do you know Monica Lewinsky?
 21: A Yes, sir, I do.
 22: Q How did you meet her?
 23: A I hired her.
 24: Q How did she get brought to your attention?
 25: A She was working in correspondence for -- as an

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[1] intern for Leon Panetta's office. And Jennifer Palmieri
 [2] brought her to my attention.
 [3] It was Jen -- there were several people that called
 [4] on her behalf that -- they knew I had an opening in --
 [5] Q For what?
 [6] A The correspondence office, as a staff assistant. I
 [7] had a young woman leave, and an opening became available.
 [8] And you have -- the way the White House works is when that
 [9] person leaves, you have to process paperwork, and it goes
 [10] through the administrative office.
 [11] So the administrative office knew I had an
 [12] opening. Tracy -- I can't think of her last name right now
 [13] -- who did Leon Panetta's correspondence --
 [14] Q Beckwith?
 [15] A Beckwith. Okay. -- worked -- used to work
 [16] in the administrative office so, you know, she knew I had
 [17] an opening.
 [18] Q I don't know -- is it Beckwith?
 [19] MS. WIRTH: Bobowic?
 [20] BY MR. WISENBERG:
 [21] Q Bobowic? Beckwith?
 [22] A You know, I can't remember.
 [23] Q Okay.
 [24] A She got married. That's part of the problem. And
 [25] I just --

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[1] Q That's not an editorial statement about marriage?
 [2] A No, it's not. I just -- she changed her name,
 [3] and I -- you know, at that point, I just called her Tracy.
 [4] I apologize.
 [5] Q Okay.
 [6] A And they -- you know, they contacted me and
 [7] said that they had an intern that was doing a great job;
 [8] was I interested.
 [9] Q Let me just ask you -- I want to just make
 [10] sure about something: This Tracy actually worked for
 [11] under Panetta?
 [12] A Yes.
 [13] Q Okay.
 [14] A She was the staff person for Leon, and Monica was
 [15] her intern.
 [16] Q Okay. So you've mentioned Tracy, and you've
 [17] mentioned Jennifer Palmieri.
 [18] A Jennifer Palmieri.
 [19] Q How about Ashley Raines?
 [20] A Ashley Raines, yeah.
 [21] Q Okay. What did Ashley Raines -- what was
 [22] her input?
 [23] A She was -- she -- as I remember, I think she was
 [24] her friend. And, you know, I mean, I was more interested
 [25] in hearing what Tracy had to say about her than I was

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[1] anybody else.
 [2] Q Because Monica had worked as an intern there.
 [3] A Right.
 [4] Q All right. And what did Tracy tell you?
 [5] A All of the reviews were good -- a good kid, always
 [6] at work, smart, deserves a shot.
 [7] Q All right. Nobody told you anything bad about her?
 [8] A No. And that's -- I mean, that's how I generally
 [9] got a lot of my staff.
 [10] Q Okay.
 [11] A I was big on promoting from within and also giving
 [12] the kids that worked there for free a shot at a job.
 [13] Q As a general matter, how typical was it for people
 [14] to be -- I don't mean just in your office, but as a general
 [15] matter, how typical was it for somebody to go from an
 [16] internship directly into a White House staff job?
 [17] A Very typical. I mean, I -- I've had a lot.
 [18] Q Okay. Well, I'm not asking just about yours.
 [19] We'll get to your office in a minute.
 [20] A Yeah.
 [21] Q But apparently, it is typical in your office?
 [22] A Yeah. I think it's typical within the White
 [23] House. You have several types of interns. You have interns
 [24] that have finished college and are looking for a job. You
 [25] have interns that are, you know, just there for a summer or

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[1] there for a semester and going back to school.
 [2] And, you know, those that are looking for a job, if
 [3] they -- if they shine, you tend to try and help them.
 [4] Q Okay. Now, are you in a position to tell us how
 [5] common it is for someone to go directly from an internship
 [6] into an agency job?
 [7] A I don't do that. I'm sorry.
 [8] Q Okay. But it's not like automatically you can go
 [9] from an internship into a staff job, correct?
 [10] A Oh, no, no.
 [11] Q There has to be some indication of superior
 [12] performance?
 [13] A Yes. And you have to have, you know, the
 [14] person that supervised you on a daily basis actually take an
 [15] interest -- somebody that -- you know, this is worth keeping.
 [16] Q Okay. You've mention Tracy in Panetta's office.
 [17] You've mentioned --
 [18] A Jen.
 [19] Q -- Jennifer Palmieri --
 [20] A Yes, sir.
 [21] Q -- and Ashley Raines. Anyone else you
 [22] can remember?
 [23] A I think that's pretty much it in Leon's office.
 [24] Q Okay. Other than that, what kind of reference
 [25] checks did you do?

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[1] A That was it. I mean, I talked to her. I had
 [2] interview with her.
 [3] Q Okay. How did that go?
 [4] A I asked for some writing samples. You know, just
 [5] the standard interview. It went very well.
 [6] Q The interview went well. You were pleased with her
 [7] writing samples.
 [8] A Mm-hmm.
 [9] Q You've got to say "Yes" or "No."
 [10] A Oh, yes, sir. I'm sorry.
 [11] Q Because on the paper, we don't know whether it's
 [12] "Uh-huh" or "Un-un."
 [13] A I apologize.
 [14] Q That's fine. That's all right. Did anybody, when
 [15] you were making this decision about hiring Ms. Lewinsky for
 [16] correspondence, warn you about any potential problems
 [17] with her?
 [18] A No, sir.
 [19] Q Anybody tell you that she might be a -- do you know
 [20] what the phrase "clutch" means?
 [21] A I do. I've used it.
 [22] Q Okay. And what does it mean?
 [23] A A clutch is somebody that is -- is always trying to
 [24] get into a photo, trying to be on with the principal, trying
 [25] to -- you know, gets ahold of someone and won't let go.

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[1] Q Okay. Did anybody warn you that she was a clutch?
 [2] A No.
 [3] Q Did anybody say to you, "She's been spending too
 [4] much time with the President"?
 [5] A No.
 [6] Q Anybody say to you that there's speculation she
 [7] might be having an affair with the President?
 [8] A No.
 [9] Q Did anybody say to you that Evelyn Lieberman
 [10] doesn't like her?
 [11] A No.
 [12] Q If Evelyn Lieberman hadn't liked her, what would
 [13] that have meant to you?
 [14] A She was deputy chief of staff of the White House.
 [15] If, you know, Evelyn had said to me, "Don't hire her," I
 [16] probably wouldn't have hired her.
 [17] Q Okay. Do you recall any problems in her
 [18] background, in terms of when you went and looked at her
 [19] background information?
 [20] A I don't look at her background information.
 [21] Q Why not?
 [22] A It's not my job. I mean, I get her resume, I
 [23] look at her resume, and it was a -- you know, it was fine.
 [24] As far as her background is concerned, that's -- you know,
 [25] the White House counsel does that.

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[1] Q Okay.
 [2] A And, you know, as long as she clears them and
 [3] clears a drug test --
 [4] Q Nobody had told you about any problems with her
 [5] background check?
 [6] A No, sir.
 [7] Q All right. And that was presumably done when she
 [8] got the intern position, correct?
 [9] A Presumably.
 [10] Q Some kind of a background --
 [11] A Some type of a check generally would be done.
 [12] Q They don't just let anybody in to be an
 [13] intern, right?
 [14] A I'm -- I'm not certain how they did it. I think --
 [15] I think they've actually typed it up in recent years, but I'm
 [16] not certain how -- at the time what the process was.
 [17] Q All right. You don't whether or not she had to go
 [18] through a rechecking of the background when she went to work
 [19] for you?
 [20] A She did, but it was -- it was -- I believe it was a
 [21] more --
 [22] Q Thorough?
 [23] A -- intense, more thorough.
 [24] Q Okay. And somebody would have come to you from the
 [25] counsel's office, if there had been a problem?

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[1] A Yes, because that had happened in the past.
 [2] Q All right. That's not your job, to look at the
 [3] background.
 [4] A No, sir.
 [5] Q It's somebody else's job to look, and if there's a
 [6] problem, tell you, "We've got a problem."
 [7] A If there's a problem that would prevent her from
 [8] being employed, they would come to me and say, "She's got to
 [9] go," or "He's got to go."
 [10] Q Okay.
 [11] A If there was a problem in the background that could
 [12] be explained or worked out, I probably never would have known
 [13] that. They would have gone directly to that person.
 [14] Q Did the President say anything about her, directly
 [15] or indirectly?
 [16] A Never.
 [17] Q Did he have any input into her hiring by you, as
 [18] far as you know?
 [19] A No, sir.
 [20] Q Direct or indirect?
 [21] A No, sir.
 [22] Q You've mentioned that you heard she did good work
 [23] as an intern, is that correct?
 [24] A Yes, sir.
 [25] Q Did you hear anything in particular about her work

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[1] -- well, our indication is that she went to work for you
 [2] sometime in November of 1995.
 [3] A That's where I get confused myself, because I
 [4] believe that I made an offer for her to come to work in
 [5] November, but that's when the government shutdown occurred.
 [6] Q Okay.
 [7] A So I'm not quite -- I don't -- I don't quite
 [8] remember whether her paperwork was processed before the
 [9] government shutdown. She may not have actually been an
 [10] employee of mine until after December, when the government
 [11] was reinstated -- came back.
 [12] Q All right. When you made the decision to hire her,
 [13] do you think that was before the shutdown?
 [14] A Yes.
 [15] Q Okay.
 [16] A Yes, I know it was because -- when -- you only had
 [17] to have to essential personnel on. Interns could come in,
 [18] and it was essential personnel only. And I -- she wouldn't
 [19] have been essential personnel for me, but if she was an
 [20] intern, she could have still worked.
 [21] Q What if she was neither? Could she have gotten in
 [22] on some kind of special pass? If she wasn't an intern yet
 [23] and hadn't gone to work for you?
 [24] A If she wasn't an intern -- she could have been a
 [25] volunteer, sure.

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[1] Q Okay.
 [2] A But I -- I'm not certain --
 [3] Q Sure.
 [4] A -- of that process. I think you have to have
 [5] paperwork done on that.
 [6] Q So basically, you did not hire her based on hearing
 [7] about any standout performance that she did during the
 [8] shutdown.
 [9] A No, but -- no. She did a -- she did a -- she did a
 [10] real good job. And that's -- I keep on -- you know, this is
 [11] such a short time period. I keep on getting it confused.
 [12] But I think I offered her the job first, and I was
 [13] -- I was actually pleased I did in December. She did a good
 [14] job during the shutdown.
 [15] Q All right. You heard at some point -- whether or
 [16] not it was a basis for hiring her, and apparently it wasn't
 [17] -- you did hear that she did a really good job --
 [18] A Yes, sir.
 [19] Q -- during the shutdown.
 [20] A During the -- I observed she did a good job.
 [21] Q Okay. You observed that.
 [22] A Yes, sir.
 [23] Q And in what sense did she do a good job?
 [24] A She was down in -- in Mr. Panetta's office, helping
 [25] answer the phones, doing some general typing -- office work.

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[1] You know, it was a unusual time, not too many people around,
 [2] so I do remember it well.
 [3] Q You saw her there a lot keeping long hours?
 [4] A She -- yes. Yes.
 [5] Q All right. Did you see her in the presence of the
 [6] President at any time during the shutdown?
 [7] A Yeah, the President came into Leon's office.
 [8] Q And so did you ever see her and the President alone
 [9] during the shutdown?
 [10] A Never alone. I tend to believe that's the first
 [11] time he ever met her, too, was during that -- it was during
 [12] that government shutdown.
 [13] Q All right. Just a guess on your part or --
 [14] A I believe I was in the room when -- when, you know,
 [15] he introduced himself.
 [16] Q To Ms. Lewinsky?
 [17] A Yeah, and to -- there was another -- I think
 [18] there was another -- there may have been another kid in the
 [19] room, too.
 [20] Q Was there anything about the President's
 [21] interaction with Ms. Lewinsky during the shutdown that struck
 [22] you as -- that made you think?
 [23] A No, sir.
 [24] Q All right. You know, sometimes something will
 [25] happen, it doesn't seem important at the time, and then two

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[1] years later, a big event happens and you think, "Hmm." You
 [2] think back, and all of a sudden, the earlier event takes on
 [3] more importance.
 [4] Are there any events like that with respect
 [5] to Ms. Lewinsky?
 [6] A No, sir.
 [7] Q In your mind.
 [8] A In my mind, no, sir.
 [9] Q Okay. Did he seem to be chatting more with Ms.
 [10] Lewinsky than with any others during the shutdown?
 [11] A No, sir.
 [12] Q Okay. Do you know anything about whether or not
 [13] Ms. Lewinsky delivered pizza to the President during
 [14] the shutdown?
 [15] A We got pizza -- we got pizza from -- it was
 [16] Bertucci's even. I remember that. She may have taken pizza
 [17] down to Betty and Nancy and the President. I'm not certain.
 [18] Q You don't know for sure?
 [19] A I'm not certain, no. I'm sorry.
 [20] Q Do you think you might have heard that, or just
 [21] that it's likely it might have happened?
 [22] A I think that -- they weren't coming up, so I think
 [23] she -- I think somebody did bring it down, and it probably
 [24] would have been Monica.
 [25] Q You don't have a particular recollection of

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... that, though?
 [1] A No, sir. I do remember getting pizza, though. You
 [2] can tell from the size of me.
 [3] Q You said you witnessed that she did good work in
 [4] the shutdown. Did you hear anything bad about anything she
 [5] did during the shutdown?
 [6] A No, sir.
 [7] Q All right. Nobody told you that her behavior was
 [8] inappropriate?
 [9] A No, sir.
 [10] Q And you didn't see my inappropriate behavior by her
 [11] during the shutdown?
 [12] A No, sir.
 [13] Q You didn't hear any scuttlebutt or rumor about her
 [14] being a clutch during the shutdown.
 [15] A No.
 [16] Q Didn't hear anything about her having a
 [17] relationship with the President during the shutdown?
 [18] A No, sir.
 [19] Q Okay. What, if any, effect did Walter Kaye have on
 [20] getting her the job in your shop?
 [21] A None.
 [22] Q All right. Tell us how she performed when she went
 [23] to work for you.
 [24] A Unfortunately, she performed like an intern, rather
 [25]

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[1] than a staff person.
 [2] Q And what do you mean by that?
 [3] A Interns are generally not as responsible. She --
 [4] she didn't -- she didn't live up to my expectations as a
 [5] staff person.
 [6] Q Okay. Why not?
 [7] A She was out of the office a lot. She was flighty.
 [8] The work wasn't getting done.
 [9] Q Okay.
 [10] A She didn't last long.
 [11] Q All right. You told me three things: She was out
 [12] of the office a lot; she was flighty; and the job wasn't
 [13] getting done.
 [14] A I think it's -- but I think the -- two reasons
 [15] affect the one. The job isn't getting done because of out of
 [16] the office a lot and flighty.
 [17] Q Fine. What do you mean by "flighty"?
 [18] A Oh, just -- just more interested in getting
 [19] into photo ops than doing her job. More interested in
 [20] getting into an event than doing her job. You know, more
 [21] interested in walking around to see who she could see than
 [22] doing her job. You now, she -- she didn't take it seriously.
 [23] Q What particular job was she hired for?
 [24] A For correspondence. Staff assistant in
 [25] correspondence.

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[1] Q Okay. And what was she supposed to do?
 [2] A What they do is -- several things. One is,
 [3] they write letters. The letters that they generally write
 [4] are the, you know, "Happy Birthday, Congressman X" type
 [5] of letters.
 [6] They also are responsible for getting all of the
 [7] mail from the Hill. Every House member, every Senator -- all
 [8] the mail that comes in from them goes to this office.
 [9] If it's -- if it's something that can be just a --
 [10] you know, "Thank you for writing. We'll keep this --" you
 [11] know, "We'll keep this on track," blah, blah, blah, and send
 [12] it out, they did it.
 [13] If it was a letter of substance -- if the letter
 [14] actually required a substantive response, their job would
 [15] be to task it to OMB, to Treasury, to, you know, Labor,
 [16] wherever.
 [17] Q Okay.
 [18] A And then when they'd get the response back, you
 [19] know, a decision would be made somewhere along the line
 [20] whether that letter should be answered by the President, or
 [21] whether the letter should be answered by a secretary, or
 [22] whether the answer should be by somebody in the White House
 [23] other than the President. And their job would be to make
 [24] sure that that got done.
 [25] And if the letter was from the President, they

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[1] would get it back from the agency, format it, check it for --
 [2] check it for, you know, grammatical errors. And then they
 [3] would put it on -- the President has a special paper. It's
 [4] called azure, and they would put it on the azure and then
 [5] submit it for signature.
 [6] Q Who did she work directly for?
 [7] A She worked directly for me. There was other people
 [8] in the office. Jocelyn Jolley was -- was in the office, as
 [9] well. She had worked for me as a staff assistant on the
 [10] House side.
 [11] Q Who?
 [12] A Jocelyn Jolley.
 [13] Q Okay. Jocelyn Jolley wasn't her immediate
 [14] supervisor?
 [15] A She was -- to say -- technically, yes. But there
 [16] was -- yes. I'll -- I'll live with that.
 [17] Q How many people were in that section -- the
 [18] correspondence section?
 [19] A There's always -- there's two staff people.
 [20] Q All right.
 [21] A And then, you know, interns.
 [22] Q All right. So she and Ms. Jolley were the two?
 [23] A Yes.
 [24] Q All right. Now, why do you say Ms. Jolley was
 [25] technically her superior?

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[1] A Well, as I said, this was kind of loose, in the
 [2] sense of operation. Everybody worked to get everything
 [3] done. I was a supervisor, in the sense of -- you know, if
 [4] Monica wanted a day off, she wouldn't go to Jocelyn, she
 [5] would go to me.
 [6] Q Okay.
 [7] A You know, so -- you know, Jocelyn, on paper,
 [8] could technically claim that she was the director of
 [9] correspondence, but it's more of a loose organization
 [10] than that.
 [11] Q Who was Monica's predecessor?
 [12] A Right before Monica, Melissa Bates was -- or was it
 [13] Chris Walker? Melissa -- no, it was Chris Walker, and right
 [14] -- but he wasn't there very long. It was Monica -- or --
 [15] Q Melissa Bates?
 [16] A Melissa Banks.
 [17] Q Banks?
 [18] A Melissa Banks.
 [19] Q Okay.
 [20] A And before Jocelyn, it was LeAnn Inadomi. Jocelyn
 [21] had not been in that job all that long, either.
 [22] Q Okay. Did Jocelyn have any effect on the decision
 [23] to hire Monica Lewinsky?
 [24] A I let her -- I let her interview her, but --
 [25] Q Okay.

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[1] A -- you know, no, she -- I let her interview her,
 [2] and got her opinion, but she wasn't going to be the -- she
 [3] wasn't doing the hiring or the firing.
 [4] Q Okay. Do you recall Jocelyn getting mad at all
 [5] because Monica was hired kind of without her say-so at all?
 [6] A We had a conversation about it.
 [7] Q Okay.
 [8] A And, you know, I told Jocelyn it wasn't her job.
 [9] [REDACTED]
 [10] I was still -- I was having problems with Jocelyn,
 [11] always carrying her. And quite frankly, I wasn't going to
 [12] get put into a situation where she was going to be the
 [13] deciding factor as to whether I should hire someone or not.
 [14] Q Do you recall getting a memo or an e-mail from
 [15] Jocelyn Jolley complaining about, in general, not being told
 [16] about Monica being hired, and you telling her that her memo
 [17] was out of line?
 [18] A I probably did.
 [19] Q Okay.
 [20] A I -- I -- I don't remember it, but I
 [21] probably did.
 [22] Q Okay.
 [23] A I know I had a conversation. I'm not certain if I
 [24] remember an e-mail, but I know I had a conversation with her
 [25]

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about it.
 Q But you think you would have ultimately let her interview Ms. Lewinsky?
 A I did let her interview. I'm -- I'm sure I let her interview her.
 Q Would this have been after --
 A Or talk to her, or whatever you want to call it.
 Q If you recall, would this have been before or after she complained that it was kind of a fait accompli -- Ms. Lewinsky being hired?
 A I don't quite remember.
 Q Okay. So you were already having problems with Jocelyn Jolley when you hired Monica Lewinsky?
 A Yeah, she was a great staff assistant, but she just didn't live up to the role of the detail that was needed for the correspondence job.
 Q You mean staff assistant on the Hill?
 A On the House -- no, sir, on the House side of the legislative liaison shop.
 Q Oh, correct. Because that's what she had done before she went over to correspondence.
 A Yes.
 Q All right. She had been in legislative affairs --
 A Jocelyn Jolley -- before she got the correspondence --
 A Yes, sir.

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Q -- supervisor job?
 A Yes, sir. She was a staff assistant in the House side. She, you know, answered the --
 Q But within legislative affairs.
 A Oh, yes, sir.
 Q And she was perfectly fine.
 A Yeah. I didn't pay that much attention to her at the time. I mean, she was Lorraine Miller's personal assistant, who was -- Lorraine at the time was the deputy assistant to the President and the liaison -- the top liaison for the House. And you know, as long as Lorraine didn't have any problems with her, I didn't.
 Q Did Ms. Lewinsky, like, from the git-go disappoint you, or was it more of a gradual process -- Ms. Lewinsky, I'm talking about?
 A Yes, sir. I -- she was there such a short period of time, so I don't know how -- you know, from the git-go versus -- versus, I mean --
 Q Well, apparently she was gone by about April 9th, right?
 A April, right. Yeah, it was Easter.
 Q And she would have started in December, so we're talking about five months.
 A So it was a short period of time. She was just not -- not doing it.

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Q Okay.
 A So I'm not certain where whether it was from day one, or whether it was from day five. I just don't know that.
 Q There would be some instances where she would not be at arrest desk when you needed her.
 A Yes.
 Q Now, did you have absences problems with Ms. Lewinsky? Was she absent, in the sense that she'd be gone for several days, or anything like that?
 A Not -- not days absent. Absence in the sense of not being at her desk.
 Q Okay. Any particular lack or performances by her? Let's talk about particulars. You're saying her flightiness and her wanting to be gone all the time contributed to a lack of performance. Do you remember any particular things?
 A Well, the job wasn't getting done. That's how this whole thing came to a head. I got a huge supply from OMB of letters that had not been tasked that were months old.
 Q And, you know, all of a sudden, they just dumped a huge supply of -- a huge supply of letters on OMB, saying, you know, "We need a response ASAP on the following letters." And many of the dates on the letters -- the original dates on the letter -- were months old.
 Q Okay.

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A So that's a -- that's a big problem.
 Q And when did that happen?
 A That happened sometime before April.
 Q And OMB complained about it?
 A OMB complained about it.
 Q All right. And what did you do about that?
 A That's -- that's when -- that's when this whole -- the whole thing just came to a head. I -- the way I believe it happened, you know -- if I knew this was important, I would have paid closer attention at the time, but I believe what happened was Jodie Torkelson, who was the head of the office of administration, she's kind of the chief administrative officer of the White House. Before she had that job, she was at OMB.
 Q And I think what happened was OMB went to Jodie and said, you know, "What do we do with this?" And then Jodie went to Evelyn, and then, you know, that's how I got into it.
 Q You know, "This office is not working."
 Q All right. Are you saying that the incident with OMB more or less was the cause of Jocelyn Jolley and Monica Lewinsky being let go?
 A What I'm saying is that's -- that's the straw that broke the camel's back.
 Q Okay.
 A There -- you know, that's -- that's -- that's the

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event that --
 Q As far as you were concerned.
 A Yes, sir. That's the event that brought everything -- you know, how bad this shop really was, and that they really weren't getting the job done.
 Q Okay. And this was brought to your attention, or Jodie's first?
 A It was -- I believe it was brought to Jodie's first.
 Q Okay. And did Jodie then tell you about it?
 A I believe Jodie told Evelyn.
 Q Okay.
 A And that's why I got into it.
 Q All right. And then Evelyn came to you?
 A Yes.
 Q Okay. And what did Evelyn say to you?
 A She wanted an explanation.
 Q Of what?
 A Of, you know, why letters were being tasked, you know, six months late. You know, what's the problem? You know, there's a problem over in that office. You know, things aren't getting done. You know, there was mistakes in -- mistakes in letters that hadn't been caught.
 Q Evelyn knew about other things, too, when she came to you complain to you?

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A I believe -- I believe. I mean, it's -- it's hard. I mean, we looked at the shop really hard at that time and, you know, there was a real problem there. Jocelyn was -- was not showing up for work. When she did show up, she was -- she was, you know, in late, out early. And quite frankly, we carried her for a long time because she had some health problems.
 Q That's Jocelyn Jolley?
 A Yes, sir.
 Q [REDACTED]
 A [REDACTED]
 Q Who was that?
 A John Hilley.
 Q Okay.
 Q And, you know, all of a sudden, you know, his shop is -- is at the center of attention because, you know, they're not performing their -- their job.
 Q I mean, it's a big deal for a member of Congress to get a letter -- a response back from the President that's months old. He's -- he refuses to sign letters like that. He really -- that would bother him.
 Q All right. What do you remember -- tell

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[1] us everything you remember about the discussion when
 [2] Evelyn Lieberman finally came to you. What's she mad about?
 [3] A Well, there was -- there were several discussions,
 [4] you know, in that OMB wasn't the only problem. I mean, there
 [5] was a problem -- OMB just happened to be the -- the thing
 [6] that she could point to.
 [7] Q Okay.
 [8] A And, you know, the discussion was -- I mean, the
 [9] discussion really was, "Let's get rid of them both."
 [10] Q Okay.
 [11] A "The job isn't being done, you know. What's your
 [12] opinion?" "Get rid of them both."
 [13] Q Okay. Who said, "What's your opinion?"
 [14] A Well, I mean, that was -- I think it may have been
 [15] -- I mean, I'm putting words in her mouth. It may have been
 [16] Evelyn as to, you know -- you know, "What do we think here?"
 [17] Talk with the --
 [18] Q [REDACTED]
 [19] [REDACTED]
 [20] A [REDACTED]
 [21] Q [REDACTED]
 [22] A [REDACTED]
 [23] [REDACTED]
 [24] Q [REDACTED]
 [25] [REDACTED]

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[1] than one discussion with Evelyn Lieberman about this; is
 [2] that correct?
 [3] A Yes, sir.
 [4] Q And if I remember correctly, you testified that
 [5] there was a complaint by the Office of Management and Budget
 [6] about some correspondence, and that you believe that made
 [7] its way up through somehow to Jodie Torkelson and from
 [8] Jodie Torkelson to Evelyn Lieberman; is that correct?
 [9] A Yes, sir. That's right.
 [10] Q All right. And then Evelyn Lieberman came to visit
 [11] you; is that correct?
 [12] A I went to visit her, but --
 [13] Q Okay. How did that happen? What occasioned your
 [14] visit to Evelyn Lieberman?
 [15] A I was -- she told me to come see her or her staff
 [16] assistant. I can't remember how it happened. All I remember
 [17] is that we ended up having a conversation about it.
 [18] Q Okay. She or her staff assistants told you to come
 [19] see Evelyn Lieberman?
 [20] A Yes. Yes.
 [21] Q Okay. And she was deputy chief of staff by this
 [22] time; is that correct?
 [23] A Yes, she was.
 [24] Q Okay. Tell us about that conversation or about any
 [25] other conversations. I think you mentioned over a period of

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[1] [REDACTED]
 [2] A [REDACTED]
 [3] Q [REDACTED]
 [4] A [REDACTED]
 [5] Q [REDACTED]
 [6] A [REDACTED]
 [7] A [REDACTED]
 [8] A [REDACTED]
 [9] A [REDACTED]
 [10] A [REDACTED]
 [11] A [REDACTED]
 [12] A [REDACTED]
 [13] A [REDACTED]
 [14] A [REDACTED]
 [15] A [REDACTED]
 [16] A [REDACTED]
 [17] Q [REDACTED]
 [18] A [REDACTED]
 [19] A [REDACTED]
 [20] Q [REDACTED]
 [21] A [REDACTED]
 [22] MR. WISENBERG: Thank you.
 [23] (The witness was excused at 12:45 p.m. and recalled
 [24] at 3:33 p.m.)
 [25]

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[1] a couple of days.
 [2] A Right. And it's -- it kind of gets a little
 [3] confused in my mind as to -- you know, the first -- the first
 [4] meeting, it was decided that it wasn't only Monica that was a
 [5] problem -- that the correspondence unit was a problem.
 [6] Q Okay.
 [7] A And the decision had been made or agreed to that we
 [8] should just get rid of the problem.
 [9] Q Okay.
 [10] A But neither person deserved to be terminated.
 [11] Q Okay.
 [12] A That to work it out with Patsy and Bob --
 [13] Pasty Thomasson and Bob Nash -- and, you know, see if we can
 [14] put them someplace else, give them another try, give them
 [15] another shot.
 [16] Q Okay.
 [17] A Which I did. I talked to Patsy and Bob. Then I
 [18] had a -- probably another follow-up conversation with Patsy.
 [19] So a lot of my talking back and forth with Evelyn
 [20] was, you know, "Have you done anything yet?" "Are you doing
 [21] anything?" You know, "What's the status?" It was that type
 [22] of conversations.
 [23] Q Okay. Tell us as best as you can recall -- you go
 [24] to your meeting with Evelyn Lieberman.
 [25] A Yes, sir.

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[1] ***
 [2] MR. WISENBERG: Let the record reflect that the
 [3] witness, Mr. Keating, has reentered the Grand Jury room.
 [4] Madame Foreperson, do we have a quorum?
 [5] DEPUTY FOREPERSON: Yes, we do.
 [6] MR. WISENBERG: Are there any unauthorized persons
 [7] in the Grand Jury room?
 [8] DEPUTY FOREPERSON: No, there are not.
 [9] Mr. Keating, I need to remind you that you're
 [10] under oath.
 [11] THE WITNESS: Yes, ma'am.
 [12] BY MR. WISENBERG:
 [13] Q Okay. Are you the same Tim Keating who was --
 [14] Timothy Keating -- who was testifying here earlier today?
 [15] A Yes, sir.
 [16] Q I think we were talking about -- and I think we
 [17] told you earlier you could come back at 3 o'clock, and you've
 [18] graciously consented to do so. And told you that we'd get to
 [19] you by 3:30, and we're pretty close.
 [20] A Yes, sir. Thank you.
 [21] Q All right. Once again, we appreciate your
 [22] long wait.
 [23] Let me ask you -- we were right at the point we
 [24] were talking about your dissatisfaction with the performance
 [25] of Monica Lewinsky, and I think you said you had more

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[1] Q At this point in time, you haven't even heard about
 [2] the incident with Office of Management and Budget.
 [3] A No, sir, I had.
 [4] Q You had heard. Somehow word had gotten to you.
 [5] A Oh, yeah. That's -- that's --
 [6] Q Okay.
 [7] A Well -- oh, I'm getting confused. Yeah. I can't
 [8] remember the -- I think what happened was -- I knew about it
 [9] going into it. I knew that there was a problem.
 [10] I don't know how I knew. Whether it was, you know
 [11] -- whether it was a conversation on the phone -- I knew that
 [12] there was a problem, and I knew the problems was involving
 [13] correspondence.
 [14] Q Going into the meeting?
 [15] A Yes, sir.
 [16] Q When you say the conversation on the phone,
 [17] you mean the conversation with either Ms. Lieberman or
 [18] her aide --
 [19] A Yes, sir.
 [20] Q -- asking you to come see Ms. Lieberman?
 [21] A Correct.
 [22] Q Okay. And I guess the reason I asked it that way
 [23] -- assuming that you might have not known going into the
 [24] meeting -- is that you said that information about this
 [25] incident went from Jodie to Evelyn Lieberman.

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[1] A Correct.
 [2] Q And then you're talking to Evelyn Lieberman.
 [3] So I didn't know if you knew about it before you went into
 [4] the meeting.
 [5] A No -- well, I knew about it in the sense that
 [6] -- you know, I know that before I went into that room,
 [7] I knew there was a problem, and I knew it was in my
 [8] correspondence office.
 [9] Q Okay. Now, tell us as best you can remember the
 [10] conversation you had with Evelyn Lieberman when you were
 [11] called into visit with her.
 [12] A As I said before, if I'd known it was important,
 [13] I would have paid closer attention. It's hard for me to
 [14] remember what, you know, fully went on, with the exception --
 [15] Q As best you can remember.
 [16] A Yeah. I mean, with the exception of, you
 [17] know, "How bad is this situation?" You know, "The
 [18] President would have a fit if he saw, you know, this stuff."
 [19] Q Meaning what?
 [20] A The letters that were backlogged coming out of my
 [21] office that members of Congress were not getting responded to
 [22] in a timely fashion.
 [23] And, you know, there were other problems,
 [24] and, you know, we talked about my correspondence unit, what
 [25] the problems were within it.

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[1] [REDACTED]
 [2] [REDACTED]
 [3] Q All right. In what way?
 [4] A Her not doing her job, being around -- you know,
 [5] how could she be doing her job if she was, you know, floating
 [6] in the West Wing and trying to get into photo ops.
 [7] And, you know, Evelyn was -- she was like the
 [8] strict mother of the West Wing. She knew who came in, she
 [9] knew who went out.
 [10] She -- you know, she -- she was not afraid of
 [11] anyone. She would tell people this and that, you know. You
 [12] know, "Put on your jacket."
 [13] She was -- she was very good. She was a hands-on
 [14] person. Well, you know, if you hang around, not doing
 [15] anything, Evelyn was sure to pick it up. And she sure did.
 [16] Q All right. And you had these conversations with
 [17] Evelyn even before --
 [18] A I had conversations with Monica about that before
 [19] all this --
 [20] Q About hanging around the West Wing?
 [21] A About hanging around the West Wing, about the
 [22] path she used to take to go to, you know, the Old Executive
 [23] Office Building.
 [24] See, part of the problem is that her office was in
 [25] the East Wing, and the auto pen -- which is a signature

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[1] device used for the President's signature on letters that
 [2] he's not going to sign personally -- is over here in the old
 [3] building (indicating). It's in the Old Executive Office
 [4] Building. It's in a separate -- separate building.
 [5] But to get from here to there, you have to go
 [6] through the executive residence, you have to go into the
 [7] West Wing, and the fastest route is to cut across the west
 [8] lobby and down the stairs and over.
 [9] You know, Monica would always take this big swing
 [10] around and go past the Oval Office, go past Evelyn's office,
 [11] go past Leon's office, seeing what was going on.
 [12] Q Let me show you something.
 [13] A Yes, sir, happy to.
 [14] Q I have an exhibit here. I'm going to call
 [15] this TK-1.
 [16] A Yes, sir.
 [17] Q And this purports to be a floor plan of the
 [18] West Wing.
 [19] A Mm-hmm.
 [20] Q Of the Oval Office level of the West Wing.
 [21] A Yes, sir.
 [22] Q And you can see there is some -- in addition to the
 [23] floor plan there's some writing on there. Do you see that?
 [24] A Yes, sir.
 [25] Q Okay. To the best that you can -- now, she's over

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[1] -- Monica is over in the East Wing?
 [2] A She's way over here (indicating).
 [3] Q Okay. And is she on this level, or a level higher?
 [4] A No, it's this level.
 [5] Q Okay.
 [6] A But when you -- actually, when you come across he
 [7] -- in the executive mansion, you come in the first floor,
 [8] which is a diplomatic receiving room and the library, a few
 [9] other rooms. And then you come out of the court -- a covered
 [10] court, and then you cross over another doorway to go
 [11] outside. You actually have to go outside.
 [12] But it's covered. It's -- the Rose Garden
 [13] to the left, which is outside of the Oval Office. The
 [14] Rose Garden is here. Then there's a brick -- not a brick,
 [15] but a stone patio that's covered that you walk up, and you
 [16] walk along, and then you enter two doors, and right here is
 [17] the press room (indicating).
 [18] Q Okay.
 [19] A The lower press office. And you come up and then
 [20] you -- as you come up, there's a police officer stationed
 [21] right here (indicating).
 [22] Q All right. Is that where it says "Desk No. 1" on
 [23] this map?
 [24] A It's -- it's -- I can't quite tell because I don't
 [25] know what this is, but that's probably right, because it's

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[1] stuck in the -- in the corner.
 [2] Q Okay. What I'd like you to do --
 [3] A Yes, sir.
 [4] Q -- is to the extent that you can do it on this map,
 [5] because this is only a map of the West Wing --
 [6] A Right.
 [7] Q -- on the level of the Oval Office.
 [8] A Yes, sir.
 [9] Q Show us with this red pen, this Sharpie --
 [10] A Yes, sir.
 [11] Q -- where Monica Lewinsky's route was that you
 [12] were just describing when she would go to get the autopen
 [13] signed, to the extent that you were saying she went by
 [14] Evelyn's office --
 [15] A Right. You --
 [16] Q You know, show us how this route would be, to
 [17] your knowledge.
 [18] A Well, it's the wrong way to go.
 [19] Q Which is the way she went.
 [20] A Correct. Well, at first. I think she straightened
 [21] up at the end, hopefully.
 [22] But she would come in. You walk past the cabinet
 [23] room. There's -- well, you come up the -- there's a ramp, as
 [24] I said, that leads -- this is the entrance to the lower press
 [25] office (indicating). You come in a door here, you come up

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[1] the ramp. The police station -- guard station is there. You
 [2] walk into a doorway.
 [3] There's a -- there's a hallway, but it's a broad
 [4] hallway because the cabinet room is here. And then instead
 [5] of making -- instead of going to the left out, she would
 [6] walk around this way past where, you know, the entrance to
 [7] Nancy Herreich's and Betty Curie's office.
 [8] Q Okay.
 [9] A And cut around. Now, these are all closed doors.
 [10] Q Right.
 [11] A There's a police officer stationed out here.
 [12] you know.
 [13] Q You're at 11 o'clock of the Oval Office?
 [14] A Yes, sir.
 [15] Q Okay. And you'd come this way (indicating). And
 [16] as you come around, George's office is here, Evelyn's office
 [17] is over here. There's a receiving room here with other
 [18] staff people.
 [19] Q Okay.
 [20] A And then the out door -- Leon's -- Leon Panetta's
 [21] receiving --
 [22] Q Right.
 [23] A -- is here where, you know, Jennifer Palmieri and a
 [24] few others were.
 [25] And then she would walk this way, past the

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Vice President's office this way. And then there's a hallway down that comes literally right out of this office. It goes down --

Q All right. Hold on just a second. -- and then down the stairs.

Q Okay. You said there's a hallway that goes out of the reception area to the right of Leon Panetta's office?

A No, this whole hallway -- the hallway is straight.

Q Okay.

A Like, if you're standing at the stairway at the West Wing, you can go straight through the lobby.

Q Okay.

A Or if you're looking straight ahead, you can literally look right into Leon's outer office.

Q Okay. You have stopped the red line right at where she would go down the stairway.

A Yes, sir, that's the stairs.

Q Okay. So you're starting it at the right -- the upper right of the map, and you're ending it kind of mid left.

A Yes, sir.

Q And you would say that's the route she would take, right by the Oval Office, and that is an incorrect route, or not the quickest route.

A Well, the -- I mean, if you look, here's the --

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here's the direct route.

Q Okay. With this blue pen --

A Yes, sir.

Q -- show us what she should have done. Put a line or arrow where she should have gone, instead of where you've done with the red pen.

A It's -- it's this route (indicating).

Q Okay.

A Should I go from here?

Q No, just the -- just where she should have deviated from.

A Okay. (Witness complies.) Right -- right here.

Q Okay. All right. All rightie. So I'm just going to hold it up for the grand jurors. You can come over here -- no, never mind.

A I'll be happy to.

Q No, stay where you are.

A Are you sure?

Q Stay where you are.

A Okay, sir.

Q I don't want to hurt your back any more. We've got the route in red, and we've marked in blue pen where the deviation should have been (indicating).

Q Okay. This red route takes you right by the Oval Office, the offices of Stephanopoulos, the offices

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of Panetta (indicating).

Q Okay. She took the scenic route.

A Yes, sir.

Q All right. Now, as I understand it, Ms. Lieberman had complained to you previous to this incident -- this what we'll call the OMB incidents -- about Monica hanging around -- the West Wing, or the Oval Office too much?

A No, it was always the West Wing. And a lot of it was this route that was the problem.

Q And you had actually spoken to Ms. Lewinsky about this?

A Yes, sir, I had.

Q What would she say when you would tell her about it?

A That she was just trying to do her job. But her job did not entitle her to hang around the West Wing or take that route. Just go through, get your job done, and go back.

Q And did you make that clear to her?

A Yes.

Q All right. I mean, that's not much of a response. Is it -- she's trying to do her job? The whole point is she doesn't have to go that route to do her job.

A Right. She -- you know, that's -- that's true.

Q Did she ever agree, "Okay. I won't do that as much"?

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A Yes.

Q I mean, presumably, if she had told you, "No, I'm going to continue to go right by the Oval Office here --"

A She would have had a problem.

Q Yes. Okay. How many times did Evelyn Lieberman discuss this issue with you -- Monica hanging around the West Wing -- which I take it merges with the route issue?

A Yeah.

Q Okay. How many times did she discuss this with you prior to the incidents that led to the removal of Ms. Lewinsky?

A Probably a couple times.

Q Okay. How many times did you discuss this with Ms. Lewinsky?

A Probably a couple times.

Q All right. Did Ms. Lieberman complain that she had seen Ms. Lewinsky several times take this route, or in the wrong place?

A It was, you know, how can -- you know, "What's going on over there?" She says, "Don't you have enough for her to do?" You know -- you know, "What's -- what's the problem?"

And you know, it was -- that was Evelyn's way. She would question that with anyone. You know, I mean, if she saw somebody not doing their job -- especially, you know, a

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paid staff person -- she would brush them away.

I mean, it's the same thing with, you know, people, if they smoked, and they -- I mean, you're not allowed to smoke in the building. They would go down on the West Drive, and if Evelyn came out, she would shoo them away, "Get back to work."

Q By the way, I might have asked you this before the break, earlier today, but have you been -- have you or your attorney been debriefed about anything Evelyn Lieberman has either told investigators or has told anybody with respect to this case?

A I've not talked to Evelyn Lieberman. I don't know if my attorney has talked to -- I mean, I think he's talked to other attorneys in this --

Q Do you know whether or not he's been debriefed about anything Evelyn Lieberman has said about this case?

A Not to my knowledge.

Q Okay. Was Monica Lewinsky fired or removed -- first of all, how would you characterize it: Firing? Removal?

A She was -- she wanted to stay in the White House. She couldn't stay in the White House. If you want to classify that as firing, that's fine. But she was put into another position. She wasn't thrown out. She deserved to -- you know, in my opinion, she deserved

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to have another chance.

Q That's why I was asking you to characterize it. Would it be fair to call it a removal?

A She was removed. Yes, sir.

Q Okay. And she would have wanted to stay.

A She did want to stay.

Q She did want to stay.

A Yes, sir.

Q Okay. Was she removed --

A But so did Jocelyn Jolley.

Q So did Jocelyn Jolley?

A Yes, sir.

Q All right. Was she removed because of the OMB incident, or because she was hanging around the West Wing too much, or is there a third reason?

A I can't -- you can't separate the reasons. The reason was the job wasn't being done in the correspondence office.

Why wasn't the job being done in the correspondence office? Because of she wasn't at her desk enough, she walked around the West Wing a lot, she wasn't getting the job done.

And Jocelyn, you know, was not a good supervisor. She was out a lot. She let things slide.

I mean, there's -- I think there's a thousand reasons that are there, and that's -- you know, it's

OIC-Starr

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[1] all one.
 [2] Q Did you say that the straw that broke the camel's
 [3] back - for you, at least - with Ms. Lewinsky was the
 [4] OMB incident?
 [5] A No, sir.
 [6] Q The final straw?
 [7] A The final straw with the office of correspondence
 [8] was the - yeah, the OMB letters.
 [9] Q Okay.
 [10] A When I got - I got pulled down. I had to explain
 [11] it. I had a new boss, who's saying to me, you know, "I'm in
 [12] the job a month, and I have, you know, people claiming that
 [13] we're not doing our job here." You know, "Fix it."
 [14] Q Okay. As far as you're concerned, was that the
 [15] final straw that caused you to want to remove Ms. Lewinsky
 [16] and Ms. Jolley?
 [17] A Yes, sir.
 [18] Q Okay. Now, was that a decision you reached
 [19] independent of anything Evelyn Lieberman said to you?
 [20] A It was - it was joint.
 [21] Q Okay. Let me ask you this: At some point in time,
 [22] did Evelyn Lieberman say - let's talk about Monica first.
 [23] Did she say, "Get rid of her"?
 [24] A I don't know if it was ever singled out her. I
 [25] think it was get rid of "them."

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[1] Q All right. And at what point - you said you
 [2] talked to her more than once during a period - I think
 [3] more than once during a period of a couple of days -
 [4] A Yes, sir.
 [5] Q - after this OMB incident occurred; is
 [6] that correct?
 [7] A Right. Right.
 [8] Q Okay. At some point in time, Evelyn Lieberman
 [9] ordered you - I want to know how it happened. At some point
 [10] in time, she said, "Get rid of them"?
 [11] A Right. We were talking and, you know, the
 [12] problem in the office - you know, after this - the OMB
 [13] thing, I went over and checked that to see, you know, what
 [14] the volume of correspondence was, versus what the output
 [15] was. And, you know, it was very clear that nothing was
 [16] getting done over there.
 [17] And there was problems beforehand. I'd talked to
 [18] both [redacted] and Monica about this. There were - you know,
 [19] I would call over there. And the one thing that I always was
 [20] a fanatic about was having my phones answered, because I had
 [21] 535 constituents on the Hill that were demanding.
 [22] And, you know, I would call over to my office to
 [23] get a copy of a letter, and it would roll over to voice
 [24] mail. So, you know - I - you know, I told them that that
 [25] had to stop.

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[1] I mean, there was a series of events that led
 [2] up to - to the final days. So when we went in to talk to
 [3] Evelyn - I believe Jodie was in the room as well. You know,
 [4] it was, "Tell me what's going on over there."
 [5] Q Okay.
 [6] A And I had to be honest. I mean, the shop wasn't
 [7] running right. [redacted] you know, I carried her really
 [8] a long time. And I like her. She's a - she's a sweet
 [9] person. And she'd worked there for three years, and she
 [10] got into a job that she couldn't handle. It doesn't mean
 [11] she deserved to be fired.
 [12] Monica was - you know, she never made the
 [13] transition between a staff person - an intern and a staff
 [14] person, you know. That's fine, too, but that's not something
 [15] that should prevent her from losing her job.
 [16] Q At some point in time, did Evelyn Lieberman say,
 [17] "Get rid of these people"?
 [18] A Yes.
 [19] Q Was Jodie Torkelson in the room when that happened?
 [20] A I'm sure - I'm sure she was.
 [21] Q Okay. Did Evelyn Lieberman say - I want you to
 [22] listen to my question very carefully, and if there's anything
 [23] about it you don't understand, I want you to ask me and I'll
 [24] rephrase it.
 [25] A Yes, sir.

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[1] Q Was this a situation where Evelyn Lieberman said,
 [2] "I want you to get rid of Monica Lewinsky because I'm tired
 [3] of her hanging around the West Wing," and then, "By the way,
 [4] what kind of worker is she?"
 [5] And you said something like, "Her work is really
 [6] bad, too." And Evelyn said, "Get rid of her."
 [7] Was that how the conversation went?
 [8] A No.
 [9] Q Okay. As I understand what you're saying,
 [10] it's a situation that Evelyn Lieberman knew about already,
 [11] in general.
 [12] A Right.
 [13] Q She knew that it was a situation of both inferior
 [14] work by Monica and [redacted] -
 [15] A Correct.
 [16] Q - and the separate problem of Monica being where
 [17] she shouldn't be - in the West Wing?
 [18] A That clearly added to it too, yes, sir.
 [19] Q And a precipitating factor - in terms of
 [20] Evelyn Lieberman saying, "Get rid of them" - was the
 [21] OMB incident?
 [22] A Yes, sir.
 [23] Q Is there any way about how I've described it that
 [24] is incomplete or that you would like to add to?
 [25] A No, I think that's pretty accurate.

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[1] Q Okay. Do you know whether or not Jocelyn Jolley
 [2] got any training for this particular job in correspondence?
 [3] A That's - unfortunately, those jobs a lot of the
 [4] time of baptism with fire. The person that left was a woman
 [5] by the name of LeAnn Inadomi, who was absolutely wonderful.
 [6] She had done the job since day one.
 [7] She was still in the compound, working for cabinet
 [8] affairs. You know, as far as a, "Sit down, and let me walk
 [9] you through everything," no. There wasn't somebody sitting
 [10] with her for three weeks, training her.
 [11] Q Jocelyn Jolley?
 [12] A Correct. Training her exactly what to do. But,
 [13] you know, LeAnn told her how to do the job and what to do.
 [14] And LeAnn was in the complex and, you know, all she had to do
 [15] was pick up the phone and call.
 [16] Q Jocelyn?
 [17] A Jocelyn. And, you know, she was told that, LeAnn
 [18] told her she would help her, you know. I don't think she
 [19] availed herself of that much, though.
 [20] Q Now, Jocelyn Jolley was there, I believe you said,
 [21] two years before she ever went to correspondence.
 [22] A Yes, sir.
 [23] Q She was in legislative affairs.
 [24] A Yes, sir.
 [25] Q Everybody was happy with her work there.

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[1] A Yes, she did - she was Lorraine Miller's personal
 [2] assistant, so she did a lot of her scheduling, answering
 [3] phones, sent photographs out. She did a lot of things -
 [4] she did a lot of things that were specific to one person.
 [5] Q [redacted]
 [6] [redacted]
 [7] [redacted]
 [8] A [redacted]
 [9] [redacted]
 [10] [redacted]
 [11] [redacted]
 [12] [redacted]
 [13] [redacted]
 [14] Q [redacted]
 [15] [redacted]
 [16] [redacted]
 [17] A [redacted]
 [18] [redacted]
 [19] Q [redacted]
 [20] [redacted]
 [21] A [redacted]
 [22] [redacted]
 [23] [redacted]
 [24] [redacted]
 [25] [redacted]

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[1] [REDACTED]

[2] [REDACTED]

[3] [REDACTED]

[4] [REDACTED]

[5] [REDACTED]

[6] [REDACTED]

[7] [REDACTED]

[8] Q Did she seem surprised when you told her -- I

[9] assume you told both Monica and Jocelyn that they were going

[10] to be removed?

[11] A Yes, sir, I did.

[12] Q Did you tell them separately?

[13] A I told them together?

[14] A Okay. And did [REDACTED] seem surprised?

[15] A I don't know if she seemed surprised. I think -- I

[16] think they both knew it was coming. She left me a voice mail

[17] message afterwards.

[18] Q [REDACTED]

[19] A Yes, sir, she did, that wasn't you know -- it

[20] wasn't -- it wasn't too nice, but then --

[21] Q All right. And what was that voice mail message?

[22] A You know, it was -- she felt that I didn't treat

[23] her fairly and that she was a good and loyal staff person

[24] and that, you know, she just was not happy with -- with

[25] having to leave.

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[1] Q Had you warned her -- you said there were no

[2] written reprimands or warnings in her file, correct?

[3] A That's correct.

[4] Q Had you warned her that she might be fired if her

[5] behavior continued?

[6] A What I had to said to them, and said to them both

[7] on numerous occasions, was this couldn't continue like this.

[8] You know, I had -- and --

[9] Q What couldn't?

[10] A The lack of performance, the absence, the not

[11] answering phones, the wandering around the old building, the

[12] -- you know, taking -- instead of taking one letter to the

[13] Hill -- taking a pack of letters to the Hill for delivering,

[14] taking one letter and taking several trips a day, just to be

[15] out of the office.

[16] There was -- I mean, there was a pattern. And I

[17] told them it couldn't -- it couldn't continue. They were

[18] both aware of that.

[19] And just as -- you know, I think if I was going to

[20] quote/unquote fire them in the sense of, "You're fired, leave

[21] today, clean out your desk," and have, you know, security

[22] walk them out, you know, yeah, would I have probably given

[23] them a written reprimand beforehand or something of that

[24] nature? I probably would have.

[25] But quite honestly, they were placed somewhere else

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[1] for another chance. And when I talked to them that day,

[2] that's what I told them -- that they both were getting a

[3] second chance.

[4] Q You said that you told each of them this couldn't

[5] continue, correct?

[6] A Before that day, yes, sir.

[7] Q Right. But had you told either one of them

[8] that they were going to be fired if they continued a

[9] particular behavior?

[10] A I don't think I ever used that term, no, sir.

[11] Q Okay. Did you tell them they were going to

[12] be removed?

[13] A I don't think I ever said that, either.

[14] Q Okay. Tell us about the firing. How soon after

[15] Evelyn told you to get rid of them did you tell them they

[16] were going to be removed?

[17] A I didn't do it -- I didn't tell them until I

[18] had it done.

[19] Q What do you mean by that?

[20] A I went to talk to Bob Nash and Patsy.

[21] Q Okay.

[22] A And I told them that I had to place two people,

[23] that I was getting rid of them, that there were some

[24] problems, and that -- that it was time to see if we

[25] can get them somewhere else.

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[1] [REDACTED] had a far more problem with work

[2] performance than did Monica, in the sense that, you know,

[3] she had a longer pattern of not getting the job done. I

[4] think she was --

[5] Q As I understand you, even though a lot of Monica's

[6] problem was caused by the fact that she was hanging around

[7] the West Wing too much, there were also substantive

[8] problems. You mentioned, for instance, taking one

[9] letter at a time to deliver.

[10] A Yeah. Right. The job wasn't getting done, and

[11] part of the reason the job wasn't getting done was this

[12] nonsense, you know. That's --

[13] Q What is "this nonsense"?

[14] A I mean, the -- you know, the taking --

[15] Q Scenic tour?

[16] A The scenic tours, the -- you know, the -- just the

[17] inability to organize oneself to -- you know, if you're going

[18] to take one letter to autopen, why don't you print the other

[19] 25 that are right behind it.

[20] Q Okay. You were starting to say that it was more

[21] difficult to place [REDACTED].

[22] A Yes.

[23] Q Okay.

[24] A Yeah. Even the placement was different. She was

[25] put at -- she went over to GSA on a 120-day appointment -- a

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[1] probation type of a job.

[2] Q Okay. Did she know that?

[3] A Yes.

[4] Q That it was probationary?

[5] A Oh, yeah.

[6] Q Who told her that?

[7] A I did.

[8] Q And did Patsy Thomasson know that --

[9] Patsy Thomasson know that it was probationary?

[10] A Yes, it was a 120-day assignment. So that's -- and

[11] I think she was upped one other time. And the first 120 days

[12] she did well, then slipped back into a pattern, and I know

[13] she was -- she was let go from GSA.

[14] Q Why did Monica get a better assignment than

[15] [REDACTED]?

[16] A Because she was a kid that didn't make the

[17] transition between a intern and a staff person. And she --

[18] she made some stupid mistakes, but I think by and large, she

[19] was -- she could get the job done, if she didn't have other

[20] distractions. And she was given a second chance. She needed

[21] a shaking up.

[22] Q Okay. What did you tell Patsy Thomasson?

[23] Patsy Thomasson is the only or primary person you worked

[24] with in presidential personnel to place these women?

[25] A As I remember it, I talked to Patsy Thomasson and

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[1] Bob Nash. But I think I talked to them together, and any

[2] follow-up was with Patsy.

[3] Q What did you tell them about the problems, if any,

[4] with these employees? Let's start with Monica Lewinsky.

[5] A I -- well, you asked me the term "clutch" before.

[6] I think I probably said that with Monica.

[7] Q Okay.

[8] A I probably said that with Monica to Patsy. She --

[9] she was a clutch. There was a problem there.

[10] Q Other than the clutch/scenic route problem, did you

[11] discuss with anybody in presidential personnel the other

[12] performance problems of Monica Lewinsky?

[13] A I discussed the problem that I was having in the

[14] office. And the problem in the office was that the job

[15] wasn't getting done.

[16] If the job wasn't getting done, you know, one of

[17] the reasons was that, you know -- from Monica was that, you

[18] know, she was a clutch, she was trying to get into events,

[19] she was walking around too much.

[20] The reasons for [REDACTED] was she just wasn't showing

[21] up for work. When she was -- when came in, she would leave

[22] early. You know, there -- you know, yeah, I talked about

[23] those problems.

[24] Q Did you also mention, if you recall, to

[25] Patsy Thomasson to OMB incident -- I take it the OMB

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[1] incident -
 [2] A It was known, yes, sir.
 [3] Q Okay.
 [4] A And that's - and she had - I think Patsy even
 [5] confirmed with Jodie about the OMB.
 [6] Q Okay. The OMB incident involved both
 [7] Monica Lewinsky and [REDACTED] is that correct?
 [8] A Well, that's my - that was the correspondence
 [9] unit. So the correspondence unit didn't task these letters.
 [10] So yeah, it involved them both. I mean, there were two
 [11] people in that office every day, opening the mail, deciding
 [12] which pile it goes in. I mean, they didn't - they didn't
 [13] decide to - you can't separate them.
 [14] Q Okay. Did you discuss - in addition to the OMB
 [15] incident with Patsy Thomasson - this phenomenon of Monica
 [16] delivering one letter at a time, one piece of correspondence
 [17] at a time?
 [18] A I probably - I probably talked to her about, you
 [19] know, that type of material. It's just that I don't remember
 [20] my exact words to Patsy, but -
 [21] Q Okay. What I'm trying to get a bead on, if you
 [22] recall, is when you talked about Monica Lewinsky with Patsy,
 [23] did you say that it was exclusively - her exclusive
 [24] problem, which also impinged on her work, was that she
 [25] took scenic tours, or that there were also things where

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[1] she couldn't -
 [2] A No.
 [3] Q - cut it at work?
 [4] A No, there wasn't an exclusive problem. There were
 [5] problems that led to this office not functioning properly.
 [6] Q I take it, your discussion with Patsy from
 [7] the git-go, and with Bob Nash, was about both of
 [8] these employees.
 [9] A Yes, sir.
 [10] Q In other words, it's not a coincidence that they
 [11] both happened to be removed on the same day.
 [12] A It was - I planned it that way.
 [13] Q Okay. And that's because they weren't operating
 [14] their office properly?
 [15] A Correct. The office was being run poorly, and if
 [16] I'm going to make that type of a move, you know, this whole
 [17] operation needs to be pulled apart and then put back together
 [18] new. I needed them both out of there.
 [19] Q Would you expect the person who Monica was placed
 [20] with to have been told both about her performance problems
 [21] and her clutch problem?
 [22] A I think that - I wouldn't - you know, I didn't do
 [23] that routinely. No, I didn't talk to anybody over at DOD.
 [24] So I don't - I mean -
 [25] Q That wasn't your function?

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[1] A It wasn't my function but, you know, I'd want
 [2] to know.
 [3] Q If you were her new employer or her new supervisor?
 [4] A You know, sure, I would want to know. But, you
 [5] know, I think the - I think the problem here is that
 [6] Monica was a very bright person that had potential. It's
 [7] just that I think she was in the wrong situation. She was in
 [8] the wrong environment. In other words, she was star-struck
 [9] by anything and everything.
 [10] Q Tell us about the actual day that you told them
 [11] that they were going to be moved.
 [12] A It was right before Easter, probably late morning,
 [13] noon. And I can't remember if it was the Thursday before
 [14] Easter or the Friday before Easter. I know it was either one
 [15] of those days. I just can't remember when I went home.
 [16] I can't tell, because I did it - I got it all put
 [17] into place, and I pulled them in, and I said, you know, "You
 [18] know, the office hasn't been running properly. You know it,
 [19] I know it. We've had complaints."
 [20] I talked to them about the - you know, the
 [21] set of letters and that they were going to have to leave;
 [22] that no one would be told that they were fired. They're not
 [23] fired; they're just being given a different opportunity. In
 [24] fact, they could tell them it was a promotion, if they would
 [25] like. I wasn't going to, you know, talk to anybody about

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[1] that within the office.
 [2] And I wanted to handle it quietly, but I didn't
 [3] want them to be embarrassed. They had, you know, ample time
 [4] to check out. Nobody was going to follow them from point A
 [5] to Point B.
 [6] Q What do you mean by "ample time"?
 [7] A You know, when you - when you - "If it takes
 [8] you today to close out, I'd like you to close out. If you
 [9] need to come to tomorrow and - " whatever. Just you have to
 [10] - you have to go through a check-out procedure to leave the
 [11] White House.
 [12] Q But it wasn't like one week or two weeks?
 [13] A No, sir. No, sir. It is, you know, take the rest
 [14] of the day, do it.
 [15] Q In other words, they weren't escorted from their
 [16] desk immediately?
 [17] A Correct.
 [18] Q All right. They were given a day.
 [19] A Yes, sir.
 [20] Q Okay.
 [21] A And I did it on a day where a lot of people were
 [22] not really around, that they didn't have to be embarrassed,
 [23] if they were embarrassed.
 [24] Q Were they surprised?
 [25] A I don't think so.

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[1] Q Okay.
 [2] A I mean, I - the funny part is when I asked them
 [3] both to come over, I mean, think they said, "I think we know
 [4] what this is about."
 [5] Q Who said that?
 [6] A I think it was [REDACTED].
 [7] Q Okay. But -
 [8] A But they had clearly talked about on the way over.
 [9] Q Well, do you know whether or not that they were
 [10] referring to getting moved, or to the OMB incident?
 [11] A I think they were thinking this was - this
 [12] was the end.
 [13] Q All right. But they didn't articulate that to you?
 [14] A No, sir.
 [15] Q All right. I asked you if they were surprised.
 [16] You said you didn't think so.
 [17] A No, sir.
 [18] Q Were they upset, either one of them?
 [19] A Yes.
 [20] Q Okay. What was the reaction of Monica Lewinsky?
 [21] A Tears.
 [22] Q All right.
 [23] A Yeah, she -
 [24] Q What do you recall her saying?
 [25] A Not - not much during - I mean, just - we went

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[1] through, I told her that she was going to go to DOD, and that
 [2] she had to go meet with, I think it was Patsy, the following
 [3] week. And [REDACTED] was going to have a - you
 [4] know, she was going to go to GSA.
 [5] And then I talked to them both separately
 [6] afterwards. And I told [REDACTED] that, you know, she had
 [7] 120 days, you know, to straighten herself out, and I hoped it
 [8] worked; if she needed any help, I'd help her.
 [9] And then I talked to Monica afterwards, and Monica
 [10] was - you know, she asked if she could stay, and I said no.
 [11] And she asked if she could stay as a volunteer, and I said
 [12] no. She asked if she could stay as an intern, and I
 [13] said no.
 [14] She - you know, she wanted to stay. And I told
 [15] her that - that, you know, this didn't prohibit her from
 [16] coming back into the White House at some point; that she
 [17] needed to grow up; that she needed to go over to DOD, do a
 [18] good job, and then, you know, at some point, she may be
 [19] able to get a job back in the White House. But not now.
 [20] Q Did you tie that to a specific time period?
 [21] A No, sir.
 [22] Q Did you tell her she'd be able to come back after
 [23] the election?
 [24] A No, sir.
 [25] Q All right. You say that Monica Lewinsky then wrote

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[1] you a note -
 [2] A She did, sir.
 [3] Q A few days later.
 [4] A Yes, sir.
 [5] Q To the best of your recollection, what did that
 [6] note say?
 [7] A It was - it was a rambling note type of, you know
 [8] - you know, "I'm - " you know, "I want to come back."
 [9] She offered to come back as a volunteer again.
 [10] Q I want to know everything you remember about
 [11] the note.
 [12] A The one thing - the only - the one thing I
 [13] remember about the note is - is a line that she had wrote
 [14] that, "This job was my everything."
 [15] You know, she had told all of her friends. She was
 [16] - (shrugging). You know, she wanted to come back in. You
 [17] know, it was embarrassing for her to be shipped off, and she
 [18] wanted to come back in; would I consider it. I didn't
 [19] respond to the note and -
 [20] Q Did she try to pull any rank on you? I mean,
 [21] obviously, she wasn't higher than you, but did she try to
 [22] pull any rank?
 [23] A No, sir.
 [24] Q Was there any feedback from the decision to move
 [25] Monica Lewinsky?

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[1] A Zero.
 [2] Q Okay. Did anybody ever tell that you anybody other
 [3] than Monica was upset about it?
 [4] A And Jocelyn. Other than that, no, sir.
 [5] Q Did Evelyn Lieberman ever tell you that the
 [6] President asked about who had moved Monica Lewinsky?
 [7] A No, sir.
 [8] Q Did Monica Lewinsky ever call you on the phone
 [9] about coming back?
 [10] A Yes, sir.
 [11] Q How many times?
 [12] A Within that - within the first week or so - week
 [13] or two weeks, she probably called two or three times.
 [14] Q And what did she say?
 [15] A Giving me a progress report on, you know, going
 [16] over to the Pentagon; that, you know, she wasn't set yet;
 [17] she was - you know, she was - there was a few days for the
 [18] paper paperwork to catch up and, you know, asking me to come
 [19] back as a volunteer.
 [20] Q During the two- to three-day interim?
 [21] A No, sir.
 [22] Q Or just forever?
 [23] A Just in general.
 [24] Q Okay.
 [25] A That she would - she would give up any pay to come

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[1] back and prove herself within the White House. You know,
 [2] that her proving ground shouldn't be somewhere other than
 [3] the White House.
 [4] Q All right. As I understand it, basically, she
 [5] cried when you told her, basically begged you to stay.
 [6] A Yes, sir.
 [7] Q Wrote you a letter asking to stay.
 [8] A Right.
 [9] Q Called you a few times during the first week,
 [10] asking you if she could stay.
 [11] A Yes, sir.
 [12] Q But you don't think she was surprised by your
 [13] decision to move her?
 [14] A No, I don't. I - I - I think that - well,
 [15] they knew that there was a problem and I - you know, I mean,
 [16] because I was over there poking around, seeing what else was
 [17] messed up. So they knew that there was a problem within the
 [18] - you know, the week or so.
 [19] You know, I - I don't think that they were - I
 [20] really don't think they were surprised. I think that they
 [21] were unhappy. I think that they - they would have loved to
 [22] have had it changed.
 [23] You know, as I said, Jocelyn left me a voice mail
 [24] message, you know. Monica wrote me a note. They - they
 [25] both didn't leave, but -

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[1] Q Let me ask you a question.
 [2] A Yes, sir.
 [3] Q Would you have moved them when you moved them, if
 [4] Evelyn Lieberman had not ordered you to do it?
 [5] A Well, it was a - it was a discussion with Evelyn,
 [6] as well, but at that point? Yes. Yes.
 [7] Q Okay.
 [8] A The job wasn't getting done. I - as I said, I had
 [9] a new boss who, you know, had just come in and, you know, I
 [10] didn't need that headache either.
 [11] Q Okay. So even if Evelyn had not told you to fire
 [12] them after your discussions with Evelyn and Jodie Torkelson,
 [13] you would have done it yourself?
 [14] A I think I would have moved them myself, yeah.
 [15] There was a - there was a problem in that shop that needed
 [16] to be corrected.
 [17] Q All right. I want you to consider all of our
 [18] questions carefully, of course -
 [19] A Yes, sir.
 [20] Q - but I want you to listen to this one very
 [21] carefully. If there's anything you don't understand about
 [22] it, please let me know.
 [23] A Yes, sir.
 [24] Q Was the removal of [REDACTED] in any way,
 [25] shape, or form cover for the removal of Monica Lewinsky?

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[1] A Absolutely not.
 [2] Q As far as you knew.
 [3] A As far as I knew.
 [4] Q Did you hear anything, prior to the removal of
 [5] [REDACTED] and Monica Lewinsky, about the President being
 [6] caught kissing Monica Lewinsky?
 [7] A Never.
 [8] Q Did you ever see Monica Lewinsky alone with the
 [9] President Clinton?
 [10] A No, sir.
 [11] Q Did you ever see her enter a room where you thought
 [12] President Clinton had been beforehand?
 [13] A No, sir.
 [14] Q Did you ever her enter a room where you thought
 [15] President Clinton had been beforehand?
 [16] A No, sir.
 [17] Q Did you ever see her leave a room where you thought
 [18] President Clinton was beforehand?
 [19] A No, sir.
 [20] Q Did you ever see him enter a room where you thought
 [21] or found out she was there beforehand?
 [22] A No, sir.
 [23] Q Did you ever see him leave a room where you thought
 [24] or found out she was there beforehand?
 [25] A No, sir.

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[1] Q When you told -
 [2] A I assume you mean alone. I mean, you know, we'd
 [3] been into -
 [4] Q Yes.
 [5] A - groups for photos and things like that.
 [6] Q Yes.
 [7] A Okay.
 [8] Q Yes.
 [9] A All right.
 [10] Q Did you hear from anybody - let's talk about
 [11] before the last month or so, when this has become a huge
 [12] public phenomenon.
 [13] A Yes, sir.
 [14] Q Did you at any time hear from anybody -
 [15] first-hand, second-hand, third-hand, eighteenth-hand -
 [16] A Twentieth-hand.
 [17] Q - that there was a relationship of some kind - a
 [18] romantic relationship, sexual relationship - between
 [19] President Clinton and Monica Lewinsky?
 [20] A I'm trying to - trying to remember - I mean,
 [21] there's 10,000 rumors that float around the place that you
 [22] - you may hear and dismiss because of the credibility of
 [23] the people who spread such rumors. You know, may I have?
 [24] I may have. But if I had, I probably dismissed it.
 [25] Q Okay. The -

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[1] A I mean, I know that's not answering the question
 [2] really, but that's probably about the best I can -- that's
 [3] probably the best answer I have for it.
 [4] Q Was it generally known among more people than
 [5] you, Jodie Torkelson, and Evelyn Lieberman that Monica
 [6] was a clutch?
 [7] A Oh, sure. The --
 [8] Q Okay. Did fact -- go ahead.
 [9] A The clutch is showing up at events, or trying to
 [10] get into events, or just appearing. And, you know, anybody
 [11] that's at an event can kind of figure out who it is.
 [12] Q My question was rather broad, and you said that
 [13] somebody -- there were a lot of rumors going around; there
 [14] could have been a rumor by a person you didn't consider
 [15] credible. Let's talk about people that you consider
 [16] to be credible.
 [17] A Yes, sir.
 [18] Q And let's talk about within the offices of the
 [19] chief of staff and the office of legislative affairs.
 [20] A Yes, sir.
 [21] Q And my question to you is: Was there speculation
 [22] by credible people, based upon what was known about Monica
 [23] being a clutch -- was there speculation that there might be
 [24] an affair between Monica Lewinsky and President Clinton?
 [25] A I don't think I heard -- ever heard anyone say that

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[1] there was an affair between them -- anyone saw an affair,
 [2] that anyone heard of an affair.
 [3] Q But that wasn't the question.
 [4] A Yes, sir.
 [5] Q Was there speculation that might be an affair
 [6] or might be a sexual relationship of some kind in those
 [7] two offices?
 [8] A Not to my knowledge.
 [9] Q Okay. You don't remember discussing that
 [10] with anybody?
 [11] A No.
 [12] Q When you were talking with Monica Lewinsky and
 [13] Jocelyn Jolley and telling them that they could even tell
 [14] people, as I understand it, that their removal/placement
 [15] could be a promotion --
 [16] A Sure. I said to put the best light on it.
 [17] Q Okay. -- did you ask either one of them to
 [18] complete paperwork indicating that it would be a promotion?
 [19] A No, sir.
 [20] Q Okay. Do you know what a separation form is?
 [21] A Yes, I do.
 [22] Q Okay. Did you convince Jocelyn Jolley that
 [23] she should write on her separation form that she was
 [24] being promoted?
 [25] A No, I didn't convince anyone. I --

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[1] Q Did you suggest it?
 [2] A When I talked to them, what I said was that, "You
 [3] know, you can portray this as a promotion, if you'd like, to
 [4] people." I didn't want them to be embarrassed.
 [5] Q Did you authorize Jocelyn Jolley on her separation
 [6] form to say that she had been promoted?
 [7] A No, I don't know even know what she put on her
 [8] separation form.
 [9] Q The --
 [10] A Because it's not -- technically, it's not a
 [11] promotion if you put in a separation form. I mean,
 [12] you're separating. You can -- you have a list a
 [13] reason for separation.
 [14] I wouldn't -- I wouldn't think most people would
 [15] put "promotion." I think most people would put, you know,
 [16] "moved to a different agency." I don't know what she put on
 [17] her separation form, though.
 [18] Q But your answer is no, you didn't authorize her --
 [19] A No, sir.
 [20] Q -- to put that on her separation form?
 [21] A No, sir.
 [22] Q Did you authorize her to put that on any government
 [23] form -- that she had been promoted?
 [24] A No, sir.
 [25] Q Okay. Would you have been concerned to find out

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[1] that Monica Lewinsky got placed in a job that would cause her
 [2] to have frequent visits to the West Wing? I'm not saying
 [3] that happened, but would you be concerned, given one of the
 [4] reasons why she was moved --
 [5] A I think that Monica needed to be shaken up. And
 [6] the move in itself, I think, was enough to make her move from
 [7] the intern level to the staff level. And that's what needed
 [8] to happen to her. So the answer to that would be no.
 [9] Q Okay. That would not have concerned you?
 [10] A No, sir, I don't think it would have.
 [11] Q Okay. And --
 [12] A I mean, as long as she's not working in the West
 [13] Wing. If she had a -- if she had a position that -- that --
 [14] I think she just needed to be moved and shaken up a bit; that
 [15] -- you know, you need to make a transition.
 [16] Q Would it concern you if you found out -- I'm not
 [17] saying this is true.
 [18] A Yes, sir.
 [19] Q Would it concern you to find out that in the year
 [20] and a half after she left the White House and went to the
 [21] Pentagon, that there were approximately 20 times when she
 [22] was spotted in the West Wing and where it had absolutely
 [23] no relation to her job at the Pentagon?
 [24] A Would that what? I'm sorry, I --
 [25] Q Would that concern you, given what you knew about

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[1] the reasons she was transferred?
 [2] A Not -- not necessarily.
 [3] Q And why is that?
 [4] A You're go in to see friends, you go in for lunch,
 [5] you -- you know. I mean, I -- I've been gone from the
 [6] White House for over a year, and I've been in there more
 [7] than 20 times.
 [8] I -- you know, I mean, it depends on what context.
 [9] To see someone in the West Wing does not necessarily -- is
 [10] not necessarily a bad thing.
 [11] Q Meaning no disrespect to Ms. Lewinsky, you're a
 [12] higher-level person that she is; is that correct?
 [13] A Yes, sir.
 [14] Q And even now, you're a partner at one of the
 [15] premier lobbying firms in the city; is that correct?
 [16] A Yes, sir, it is.
 [17] Q The --
 [18] A I mean, I -- it depends on who her friends were and
 [19] whether they were going out. I mean, I -- you know, I had a
 [20] lot of kids that left -- not under her circumstances, but a
 [21] lot of kids that left that came back. They still go back.
 [22] Q Let me ask you this: Did you ever see her in the
 [23] West Wing after --
 [24] A Yes, sir.
 [25] Q -- she left?

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[1] A Yes, sir.
 [2] Q How many times?
 [3] A And I -- it's -- when I say the West Wing --
 [4] because a lot of times -- and I've seen her a couple times,
 [5] but a lot of times where I would see her would be going out
 [6] onto the West Exec --
 [7] Q Let's say White House then.
 [8] A White House is a better term for me.
 [9] Q Okay. How many times did you see her in the
 [10] White House after she was at the Pentagon?
 [11] A Probably about four five times.
 [12] Q All right. Did any of those -- how soon after
 [13] she left?
 [14] A I don't know. Probably within -- probably within a
 [15] month or two.
 [16] Q Did this concern you at all?
 [17] A No, I saw her -- I -- I mean, I think I saw her out
 [18] on West Exec. And I just asked --
 [19] Q Did this concern you at all?
 [20] A No. I asked her how the job was doing and how
 [21] she was doing. And, you know, I was running to a car,
 [22] you know, just --
 [23] Q You were running to go to a car?
 [24] A Yeah, I -- I mean, that's -- the cars was line up
 [25] right outside West Exec and, you know, part of my job was to

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[1] be on the Hill, back and forth a lot.
 [2] Q Did you ever hear that Evelyn Lieberman saw Monica
 [3] in the White House after Monica was sent to the Pentagon and
 [4] was upset about it?
 [5] A No, sir.
 [6] Q Did you ever hear that Evelyn Lieberman saw
 [7] Monica in the White House, period, after Monica went
 [8] to the Pentagon?
 [9] A After Monica went to the Pentagon, I never had
 [10] another conversation with Evelyn Lieberman about it or talked
 [11] to anybody about Evelyn Lieberman (sic) in this.
 [12] Q This is a person who was so willing to stay at the
 [13] White House that she offered to work there as a volunteer,
 [14] and you saw her four or five times within the first month of
 [15] her going to the Pentagon --
 [16] A No, no. I said I saw her --
 [17] Q Well, let me finish, and you can tell me if I'm
 [18] wrong about something.
 [19] You saw her four or five times within the first
 [20] month, and you weren't concerned?
 [21] A No, that's not -- you may have misunderstood me.
 [22] Q Okay.
 [23] A I said I saw her four or five times in the
 [24] remaining two years that I was the White House.
 [25] Q Okay.

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[1] A And I saw her within the first month or so.
 [2] Q On one occasion?
 [3] A Yes, sir.
 [4] Q Okay.
 [5] A I apologize for that.
 [6] Q Okay. It might not have been your problem; it
 [7] might have been my problem.
 [8] Do you ever recall discussing Monica Lewinsky with
 [9] Jennifer Palmieri?
 [10] A Sure. Jennifer recommended her.
 [11] Q Do you ever recall discussing Monica as a clutch
 [12] problem with Jennifer Palmieri?
 [13] A Not necessarily, but I -- I potentially could have.
 [14] Q Do you ever recall speculating with
 [15] Jennifer Palmieri about whether or not there was
 [16] possibly an affair of some kind --
 [17] A No.
 [18] Q -- between Monica and the President?
 [19] A No, sir.
 [20] Q Okay. You testified that you worked this
 [21] thing out.
 [22] A Yes, sir.
 [23] Q The new --
 [24] A I talked to Patsy, and by the time they got the
 [25] process done and, you know, everything was --

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[1] Q Okay. How soon before you told Monica and Jocelyn
 [2] that they were going to be removed did you --
 [3] A Tell them they had to leave?
 [4] Q Yes.
 [5] A However long it took. Probably a week.
 [6] Q Or did you tell Patsy? Did you go to Patsy? How
 [7] soon before you told Jocelyn and Monica did you go to Patsy
 [8] and Bob Nash and try to set up the new job?
 [9] A No, no, I did that first.
 [10] Q What?
 [11] A Talked to Evelyn, talked to Bob and Patsy. When
 [12] things were worked out, which probably took about a week --
 [13] Q Okay. That was my question.
 [14] A Yes, sir.
 [15] Q In other words, about a week before you told Monica
 [16] and Jocelyn that they were going to be removed -- about a
 [17] week before that is when you went to Patsy and Bob Nash?
 [18] A Yes, sir. Yes, sir.
 [19] Q Okay. I know it's difficult for you --
 [20] A I'm fine.
 [21] Q You're doing all right?
 [22] A Yes, sir.
 [23] Q Okay. I am going to have to ask you to step
 [24] outside for just a moment while I talk to the grand jurors.
 [25] A Okay, sir.

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[1] Q And I'll come and get you.
 [2] A Okay.
 [3] (The witness was excused and recalled.)
 [4] ***
 [5] MR. WISENBERG: Let the record reflect that
 [6] Mr. Keating has reentered the Grand Jury room. Do we have
 [7] quorum, Madame Foreperson?
 [8] DEPUTY FOREPERSON: Yes, we do.
 [9] MR. WISENBERG: Any unauthorized persons in the
 [10] Grand Jury room?
 [11] DEPUTY FOREPERSON: None.
 [12] MR. WISENBERG: Anything you want to remind the
 [13] witness of?
 [14] DEPUTY FOREPERSON: Mr. Keating, I need to remind
 [15] you you're under oath.
 [16] THE WITNESS: Thank you.
 [17] BY MR. WISENBERG:
 [18] Q Let me start by asking you -- I asked you a general
 [19] question about whether or not you had heard speculation about
 [20] an affair.
 [21] Did you witness an incident or hear about an
 [22] incident -- during any of your time in the White House --
 [23] that led you, yourself, to speculate that there might be
 [24] something going on between Monica Lewinsky and the President?
 [25] A I never witnessed anything. I had heard probably

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[1] fourth- or fifth- or sixth-hand that -- that she saw the
 [2] President after she was dismissed, and that was -- that was
 [3] that. I never heard any more than that about it.
 [4] Q So what do you mean "saw" the President after she
 [5] was dismissed?
 [6] A That -- the rumor was that she came in the Saturday
 [7] after she was dismissed and saw the President and asked if
 [8] -- if he would help get her job back -- or saw Betty, or
 [9] saw someone.
 [10] That was the -- that was the rumor. But nothing
 [11] ever came of it, and I never -- never proved it, never heard
 [12] of it again.
 [13] Q Who did you hear the rumor from?
 [14] A Probably somebody on the staff -- my staff, who
 [15] said that they had heard --
 [16] Q Do you remember who?
 [17] A Speculation, it probably would have been
 [18] Chris Walker.
 [19] Q All right.
 [20] A Because he was the one that actually replaced
 [21] Jocelyn and Monica. So, you know, -- you know, it was one of
 [22] these things that may not necessarily be credible. You know,
 [23] it's one of these things where he didn't see it, he heard it,
 [24] who heard it --
 [25] Q Tell me everything else about the rumor, in

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[1] the sense that, other than the fact that she visited the
 [2] President and asked for him to reverse the decision --
 [3] A That was all that I heard about it.
 [4] Q Okay. Did you ever see Jocelyn Jolley's separation
 [5] form?
 [6] A No, sir, I don't think I did.
 [7] Q Did you ever personally witness Monica taking the
 [8] scenic route?
 [9] A No, sir.
 [10] Q Did Evelyn, as far as you know?
 [11] A She talked to me about it, so I assume she did.
 [12] Q Evelyn would have been in a position to see
 [13] it, correct?
 [14] A Well, not -- well, yeah, just for the simple reason
 [15] that this is very close over in here (indicating). And, you
 [16] know, while Evelyn's office is blocked in the corner and
 [17] she really can't see out into the hallway, there's lot of
 [18] movement between Leon's office and her office, or you know
 [19] -- you know, just out in that corridor.
 [20] So sure, I'm sure she -- you know, Evelyn's office
 [21] was an interior office. It didn't have a window, it didn't
 [22] have a hall view. It had a view out into the -- out into a
 [23] reception area.
 [24] But, you know, the Roosevelt Room was right here,
 [25] where there was an awful lot of -- that's the room that

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[1] generally staff meet in or they bring people, was the
 [2] Roosevelt Room. So you'd have to come out in the hall
 [3] and go that way.
 [4] Q Did Evelyn tell you she had seen Monica take the
 [5] scenic route?
 [6] A Yeah. Yes, sir.
 [7] Q Who is Jim Dorskind?
 [8] A Jim Dorskind was the director of correspondence for
 [9] the White House.
 [10] Q Did he make any complaints to you about Jocelyn or
 [11] Monica Lewinsky?
 [12] A I'm sure he did.
 [13] Q All right. Do you recall what they were?
 [14] A I don't, because Jim Dorskind -- you know, that was
 [15] always a source of friction between -- Jim Dorskind is in
 [16] charge of presidential correspondence, and I have an office
 [17] that's in charge of congressional correspondence.
 [18] So technically, it's kind of taking away his --
 [19] some of his -- his authority to do correspondence. So there
 [20] was always a little friction as to, you know, who did what
 [21] and -- so, you know, I --
 [22] Q Okay. But you can't recall an incident of him
 [23] complaining about Monica Lewinsky?
 [24] A Not -- not necessarily.
 [25] Q Or Jocelyn Jolley?

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[1] A No, I -- I can't -- I couldn't point to a
 [2] specific incident.
 [3] Q How about Chris Walker?
 [4] A I know Chris. Chris --
 [5] Q No, do you recall Dorskind making any complaint
 [6] about Chris Walker or something Chris Walker had done?
 [7] A He probably did, sure.
 [8] Q But you don't have a recollection of it?
 [9] A Of something that Chris did that Jim would
 [10] complain about?
 [11] Q Right.
 [12] A I don't specifically remember Jim -- but I'm sure
 [13] he did. I mean, I -- that happened a lot. And it happened
 [14] with LeAnn before him.
 [15] Q Are you aware of any occasion when the President
 [16] came to office of legislative affairs and saw Monica Lewinsky
 [17] during the time she worked there?
 [18] A No, but it -- it could have happened. I can
 [19] explain why it could have happened.
 [20] Q Why could it have happened?
 [21] A When the President practices for the state of the
 [22] union address, he practices over in the East Wing in the
 [23] theater. And the restroom facility is right outside the
 [24] back, and you have to pass the correspondence office and you
 [25] have to pass the ticket -- the tour guides office.

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[1] So whenever the President was doing the state of
 [2] the union address, it wasn't unheard of for him to stick his
 [3] head in and wave at people.
 [4] Q Would you have expected staff members to make you
 [5] aware of a presidential visit?
 [6] A Not necessarily. I mean, something informal like
 [7] that -- him waving and them seeing him in the hallway -- no,
 [8] I mean, they might have said, you know, excitedly, you know,
 [9] they saw him, or -- you know, the interns.
 [10] But I don't -- I don't remember a specific instance
 [11] with Monica. Could it have happened? Sure, it could have.
 [12] Q Did you meet with Harold Ickes the night before
 [13] your interview with the FBI?
 [14] A Yes, I did.
 [15] Q Had that been a prearranged meeting?
 [16] A Yes, sir, it had.
 [17] Q All right. How soon before had it been arranged?
 [18] A Well, we had been putting each other on and off for
 [19] a while. We share a client.
 [20] Q All right. Is Mr. Ickes of friend of yours also?
 [21] A A very good friend.
 [22] Q So you've met him before? You've met him for
 [23] drinks?
 [24] A Oh, yes, sir. We've met for dinner.
 [25] Q And you've met him before for drinks?

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[1] A Oh, yeah, dinner, drinks -- he's a friend. He and
 [2] Janice Enright are both friends.
 [3] Q Is that the first point in time when you told him
 [4] you were going to be interviewed the next day by the FBI?
 [5] A Yes.
 [6] Q All right. At that meeting, or at that --
 [7] A Yeah. I'm sure of that. I probably --
 [8] Q What did he say about that?
 [9] A The only thing he said was, you know, good luck and
 [10] tell the truth.
 [11] Q All right.
 [12] A That was, you know --
 [13] Q That's the full extent of your discussion?
 [14] A The full extent of it. We were talking about
 [15] asbestos legislation.
 [16] Q Okay. That's the full extent of your discussion
 [17] about your interview and the full extent of your discussion
 [18] about Monica Lewinsky on that night?
 [19] A Yeah. I mean, I think he may have said,
 [20] you know, "Are you nervous?" And you know, "Don't be
 [21] nervous. Just, you know, go in and answer everything as,
 [22] you know, truthfully as you can and, you know, don't -- you
 [23] know, you're a witness. Just give the truth."
 [24] And that's -- I mean, it was, you know -- could
 [25] it have been the exact words? No. Could it have been

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[1] 30 seconds longer? Sure, it could have. But that was
 [2] the -- the was the gist of what he said.
 [3] Q Okay. Other than saying go in and tell the truth,
 [4] did he implicitly or explicitly indicate in any way what you
 [5] should say?
 [6] A No, sir.
 [7] Q Did he implicitly or explicitly make any threats
 [8] to you?
 [9] A No, sir.
 [10] Q You heard me talk about our investigation early on
 [11] and what grounds we were covering, what our authority was,
 [12] when you first came in.
 [13] A Yes, sir.
 [14] Q Is there anything relevant to our investigation, as
 [15] I've described it to you, that you haven't told us?
 [16] A I can't think of anything.
 [17] Q Did Mr. Ickes ask you what you know about the
 [18] President and Monica Lewinsky during this meeting?
 [19] A No.
 [20] Q I want to show you something real quick.
 [21] A Yes, sir.
 [22] Q I'm going to show you JJ-1. It's a --
 [23] (Juror leaves room.)
 [24] MS. WIRTH: Sol, we're losing a juror.
 [25] MR. WISENBERG: Do we still have a quorum?

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[1] DEPUTY FOREPERSON: Mm-hmm.
 [2] MR. WISENBERG: Okay. Let the record reflect that
 [3] we still have a quorum. Is that true, Madam Foreperson?
 [4] DEPUTY FOREPERSON: Yes, it is.
 [5] BY MR. WISENBERG:
 [6] Q All right. Here is a memo to Timothy Keating from
 [7] Jocelyn Jolley, 10 November 1995. It's Exhibit JJ-1.
 [8] Cc: Susan Brophy and Patrick Griffin.
 [9] Subject: Staff Assistant.
 [10] "Will somebody please clue me in as to when Monica
 [11] will be starting? I'd prefer not to hear it through the
 [12] grapevine, which is how I learned Chris was leaving. Thanks
 [13] for the courtesy."
 [14] Do you recall receiving that?
 [15] A Now that I see it, yeah.
 [16] Q Here's JJ-2 -- apparently your response:
 [17] "I did not like the tone of your e-mail. If you
 [18] have a problem with the way the process is going, please pick
 [19] up the phone and call me."
 [20] A That's the way we did it generally.
 [21] Q And do you recall sending that to her?
 [22] A That's me.
 [23] Q Okay. So you recall?
 [24] A I -- yeah.
 [25] Q You don't have any reason to doubt you sent it?

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[1] A I mean, I sent it. I just -- you know, as I said.
 [2] this is not the highlight of my --
 [3] Q Well, I believe you said this morning that it's
 [4] quite possible that you did so. So I'm not trying to trick
 [5] you or --
 [6] A Oh, yeah, yeah. No. I'm -- I'm sure that's me.
 [7] it sounds like me.
 [8] Q November 10, 1995. That is Exhibit JJ-3, Jocelyn
 [9] to you:
 [10] "I'm glad we had a chance to talk things out.
 [11] Although I stand by my feelings, I truly apologize for
 [12] the tone of my e-mail. I realize now that it was
 [13] inappropriate. I'm the type of person who holds
 [14] things this until I explode. Today I exploded,
 [15] and I'm sorry I exploded on you.
 [16] "P.S. Ask [redacted] about the chip in his butt.
 [17] I think he had his operatives place one in mine. Therefore,
 [18] this explains my outburst today."
 [19] All right. Do you recall receiving this?
 [20] A Yeah.
 [21] Q Okay. Do you recall that you would have had a chat
 [22] with her about her e-mail to you, and the tone of it?
 [23] A Oh, I'm sure I did.
 [24] MR. WISENBERG: Are there any questions by the
 [25] grand jurors?

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[1] explanation was why that one batch --
 [2] THE WITNESS: They never really -- it wasn't
 [3] one batch. It took -- when they left the office, it took
 [4] probably seven months to get that office back into shape.
 [5] It was a total disaster. There was hundreds -- hundreds of
 [6] letters to the President that had never been answered.
 [7] A JUROR: Spread over a long --
 [8] THE WITNESS: Spread over the period of time from,
 [9] you know, when [redacted] started, you know, through Monica. I
 [10] mean, you know, six months, seven months.
 [11] A JUROR: How come this was allowed to happen? Did
 [12] you check [redacted] on her work? Who checked her overall?
 [13] THE WITNESS: It's -- it's hard. It's hard. What
 [14] -- what happened is, they were to task it out and, you know,
 [15] sometimes you have a large volume of letters. Other times,
 [16] you wouldn't have a large volume of letters.
 [17] It's hard to say, you know, what was happening at
 [18] the time. I -- you know, I don't -- I don't quite remember
 [19] why -- I mean, I'm sure I asked about that, why -- you know,
 [20] "Why aren't we sending that much out?"
 [21] But a lot of stuff went to pen and -- you know, a
 [22] lot of stuff that I was getting or receiving or seeing was
 [23] the -- was the bulk letters, you know, where a member of
 [24] Congress would draft a letter and then have, you know, 80
 [25] members co-sign the letter with him. So what you would see

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[1] THE WITNESS: Yes, ma'am?
 [2] A JUROR: Okay. The situation with Jocelyn Jolley
 [3] and the OMB correspondence --
 [4] THE WITNESS: Yes, ma'am?
 [5] A JUROR: -- around what time was that, in terms
 [6] of dates?
 [7] THE WITNESS: You mean the date that OMB -- that I
 [8] found out about the OMB? It was probably --
 [9] A JUROR: When it wasn't sent -- whatever time it
 [10] wasn't sent. When it wasn't sent.
 [11] THE WITNESS: What -- the letters, you mean?
 [12] A JUROR: Mm-hmm.
 [13] THE WITNESS: It was a -- it was a stack of
 [14] letters. It wasn't one letter, two letters, three -- it was
 [15] a stack of letters.
 [16] MR. WISENBERG: Is your question how long was the
 [17] delay, or when did OMB complain? Is your question: When did
 [18] OMB complain about it?
 [19] A JUROR: Yeah. Or when did he hear about it --
 [20] around what time?
 [21] THE WITNESS: It was -- around what --
 [22] A JUROR: Was it around the time when you had the
 [23] budget crisis or --
 [24] THE WITNESS: No, no. The problem with OMB finding
 [25] these letters was about a week before they were dismissed.

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[1] is a large volume of letters going out, but, in fact, it was
 [2] only answering one.
 [3] BY MR. WISENBERG:
 [4] Q Do you know who complained at OMB?
 [5] A I do not, sir.
 [6] Q Okay. You mentioned that the rumor you heard about
 [7] Monica going to see the President --
 [8] A Yes, sir.
 [9] Q I thought in one version you said you might have
 [10] heard that she also went to see Betty. Was it --
 [11] A I said it could have been Betty or the President.
 [12] She was in that office.
 [13] Q Okay. You don't recall whether the rumor was that
 [14] she saw the President, or Betty?
 [15] A The rumor was that she saw -- one rumor was
 [16] that she saw Betty; the other rumor was that she saw
 [17] the President.
 [18] Q Okay.
 [19] A There was -- you know, she was in and around that
 [20] office on Saturday, after she had been dismissed on Friday.
 [21] MR. WISENBERG: All right. Any other questions?
 [22] (No response.)
 [23] BY MR. WISENBERG:
 [24] Q Let me show you very briefly JJ-4.
 [25] A Yes, sir.

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[1] About a week before they were -- you know, that was -- that
 [2] was the final thing that caused us to -- to move them.
 [3] A JUROR: Was that before the budget crisis,
 [4] or after?
 [5] THE WITNESS: Oh, it was after. It was -- the
 [6] budget crisis occurred in December, and this was in April.
 [7] A JUROR: Okay. Were you aware that somebody at
 [8] the OMB had advised Jolley to hold onto any correspondence?
 [9] THE WITNESS: That's not -- that's -- a) that
 [10] wouldn't be proper of them to do that; b) if they had done
 [11] that, she should have told me that; and c) that's just not
 [12] the way it's done.
 [13] The President of the -- these are letters to the
 [14] President of the United States. Her responsibility is to
 [15] make sure that they're answered and they get out the door --
 [16] or get to his desk, I should say, in a timely fashion.
 [17] A JUROR: So you're saying that she never told
 [18] you this?
 [19] THE WITNESS: Yes, ma'am. That's correct.
 [20] BY MR. WISENBERG:
 [21] Q Yes, she never told you?
 [22] A Yes, she never told me.
 [23] MR. WISENBERG: Yes, ma'am.
 [24] A JUROR: Well, that was kind of my question. Did
 [25] you ask her why these weren't sent? I was wondering what her

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[1] Q It's a record of an e-mail from Jodie Torkelson on
 [2] April 9, 1996 to Bob Nash and Patsy Thomasson.
 [3] A Okay.
 [4] Q It says: "Both of these staff have secured
 [5] positions in other federal agencies -- Monica at DOD and
 [6] Jocelyn at GSA."
 [7] A "I need to know if either of them --"
 [8] Q "I need to know if either of them is attempting to
 [9] arrange through your offices positions other than the ones
 [10] already arranged at DOD and GSA. Thanks."
 [11] Have you ever seen this before?
 [12] A I've never seen it before.
 [13] Q Okay. Do you know anything about it?
 [14] A No. But it makes sense.
 [15] Q In terms of what Monica was trying to do?
 [16] A Yes, sir.
 [17] Q Okay. Not --
 [18] A I told them. I mean, I -- you know, I -- what I
 [19] was hearing from them -- I was telling them that I was, you
 [20] know, hearing back she was trying to come in as a volunteer
 [21] and intern, which a lot of that would have to go -- all of it
 [22] would have had to go through Jodie.
 [23] Q Are you aware of any memo from Bruce Lindsey -- or
 [24] from anybody -- saying Bruce Lindsey has to be checked with
 [25] before either one of these people come back?

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[1] A No, sir.
 [2] Q Okay. Here's a response, apparently from
 [3] Patsy Thomasson:
 [4] "Bob and I have been working with Tim on placing
 [5] these two people. We're working closely with DOD to make
 [6] this happen for Monica. We have not finalized the deal, but
 [7] are working toward that end.
 [8] "Monica is coming in to see me today pursuant to
 [9] Tim's request of me. Our direction is to make sure she has a
 [10] job in an agency. We're working toward that end. Patsy."
 [11] Is that consistent with your testimony today?
 [12] A Yes, sir.
 [13] Q Are you familiar with this?
 [14] A I've never seen it, but it's --
 [15] Q Okay. Nothing surprising about it?
 [16] A No, sir. It's accurate.
 [17] MR. WISENBERG: Mr. Barger?
 [18] BY MR. BARGER:
 [19] Q I have two questions.
 [20] A Yes, sir?
 [21] Q Going back to your meeting with Mr. Ickes, what was
 [22] the purpose of your meeting with Ickes in the evening?
 [23] A It was -- we have a -- well, one, it was social,
 [24] but, two, we have a shared client. We're dealing with
 [25] asbestos legislation.

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[1] CERTIFICATE OF REPORTER
 [2] I, Elizabeth J. Walker, the reporter for the
 [3] United States Attorney's Office, do hereby certify that the
 [4] witness(es) whose testimony appears in the foregoing pages
 [5] was first duly sworn by the foreperson or the deputy
 [6] foreperson of the Grand Jury when there was a full quorum of
 [7] the Grand Jury present; that the testimony of said
 [8] witness(es) was taken by me by stenotype and, thereafter,
 [9] reduced to typewritten form; and that the transcript is a
 [10] true record of the testimony given by said witness(es).
 [11]
 [12] Elizabeth J. Walker
 [13] Official Reporter
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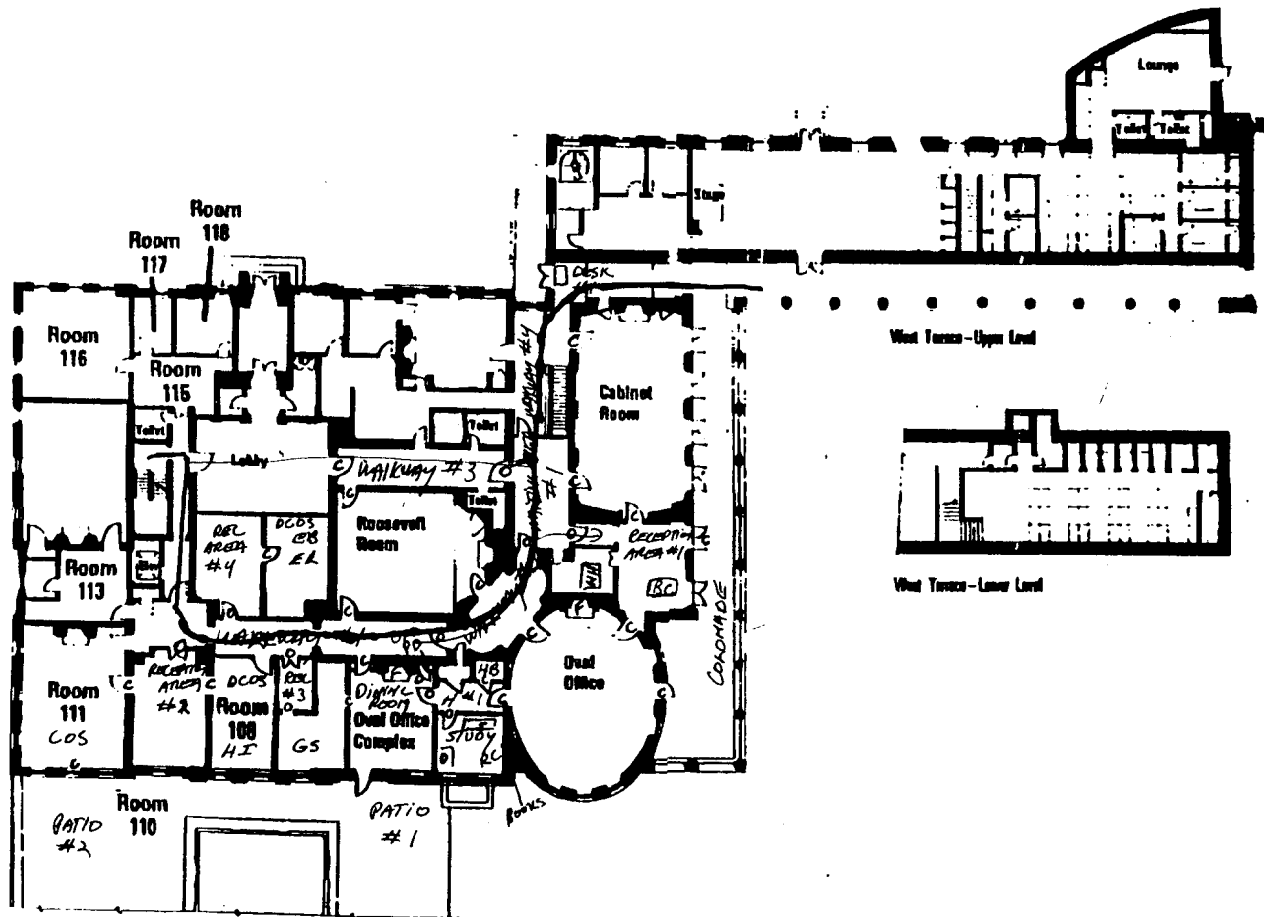
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[1] Q So I take it, then, that the purpose of the meeting
 [2] had nothing to do with your anticipated testimony?
 [3] A No, sir, it didn't. It was set up before that.
 [4] Q Then why was it necessary for Mr. Ickes to remind
 [5] you to tell you the truth?
 [6] A No, sir, it wasn't reminding me to tell the truth.
 [7] He said -- he said to me the next day -- oh, he asked if I
 [8] was nervous about it, and he said, "You know, the only thing
 [9] I can tell you," he said, "I've done a lot of these, is just
 [10] go in there and tell the truth."
 [11] It wasn't a reminder to tell the truth. It was
 [12] just his experiences in the past.
 [13] Q You were testifying also in connection with
 [14] the question asked about have you heard any rumors. And
 [15] you talked about the Saturday meeting with the President
 [16] by Monica.
 [17] My questions goes back to the original question
 [18] which was: Had you heard any rumors about a sexual
 [19] relationship between the President and Monica?
 [20] A At that time, no, sir, I had not.
 [21] MR. BARGER: Okay.
 [22] MR. WISENBERG: All right. Thank you very much for
 [23] your patience. Any other questions?
 [24] (No response.)
 [25] MR. WISENBERG: May the witness be excused?

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[1] DEPUTY FOREPERSON: Yes, sir.
 [2] THE WITNESS: Thank you.
 [3] MR. WISENBERG: Thank you very much.
 [4] (The witness was excused.)
 [5] (Whereupon, at 4:51 p.m., the taking of the
 [6] testimony in the presence of a full quorum of the Grand Jury
 [7] was concluded.)
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First Floor



West Terrace - Upper Level

West Terrace - Lower Level



STATEMENT OF TIMOTHY J. KEATING
IN RESPONSE TO PARAGRAPH h. OF THE INSTRUCTIONS
ATTACHED TO THE FEBRUARY 11, 1998 SUBPOENA TO MR. KEATING

Shortly after Ms. Lewinsky was transferred to the Department of Defense from the White House Office of Legislative Affairs, she sent me a three, possibly four, page personal handwritten letter expressing her unhappiness at being transferred. In that letter she also asked to be re-employed or to return as an intern. Soon after receiving that letter, I discarded it. I disposed of this letter because it is not my practice to keep such letters. I showed this document to several others.

